

BEFORE THE ARIZONA CORPORATION COMMISSION

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3 GARY PIERCE
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5 BOB BURNS
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COMMISSIONER

IN THE MATTER OF THE APPLICATION OF UTILITY SOURCE, LLC, AN ARIZONA CORPORATION, FOR A DETERMINATION

CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANTS AND PROPERTY AND FOR INCREASES IN ITS WATER AND WASTEWATER RATES AND CHARGES

FOR UTILITY SERVICE BASED THEREON.

Docket No. WS-04235A-13-0331

Arizona Corporation Commission DOCKETED

OCT 2 0 2014

DOCKETED BY

NOTICE OF FILING

The Residential Utility Consumer Office ("RUCO") hereby provides notice of filing the Surrebuttal Testimony of Robert Mease and Jeffrey Michlik, in the above-referenced matter.

RESPECTFULLY SUBMITTED this 20th day of October, 2014.

Daniel W. Pozefsky Chief Counsel

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AN ORIGINAL AND THIRTEEN COPIES of the foregoing filed this 20th day of October, 2014 with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

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UTILITY SOURCE, LLC DOCKET NO. WS-04235A-13-0331

OF

ROBERT B. MEASE

ON BEHALF OF
THE
RESIDENTIAL UTILITY CONSUMER OFFICE

OCTOBER 20, 2014

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EXECUTIVE SUMMARY

Based on the Residential Utility Consumer Office's ("RUCO") analysis of Utility Source, LLC's ("Company") application for a permanent rate increase, filed with the Arizona Corporation Commission ("ACC" or "Commission") on September 17, 2013, RUCO recommends the following:

<u>Cost of Capital / Cost of Equity</u> –RUCO continues to recommend a cost of capital of 9.25 percent based on the preparation of three separate cost of capital methodologies that were presented in its direct testimony. RUCO continues to disagree with the 90 basis point risk premium adjustment that has been proposed by the Company.

INTRODUCTION

- Q. Please state your name, position, employer and address.
- A. My name is Robert Mease and I'm Chief of Accounting and Rates for the Residential Utility Consumer Office. ("RUCO") My business address is 1110 W. Washington Street, Suite 220, Phoenix, AZ.

- Q. Have you previously provided testimony in this docket?
- A. Yes. I provided direct testimony in this docket on September 4, 2014.

- Q. What is the purpose of your surrebuttal testimony?
- A. My surrebuttal testimony will address the Company's rebuttal comments related to my filing of Cost of Capital testimony as well as providing additional support for my recommendations. I will also comment on the Company's recommendations.

SUMMARY OF DIRECT TESTIMONY

- Q. Can you please provide a summary of your direct testimony in this case?
- A. Yes. RUCO recommended a weighted average cost of capital of 9.25 percent. My recommendation was based on preparing a Discounted Cash Flow Model (DCF), a Capital Asset Pricing Model (CAPM) and I also prepared a Comparable Earnings Analysis (CE).

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¹ Mr. Bourassa's Rebuttal Testimony, Page 23

Q. Can you please comment on the Company's criticism of your DCF model?

Yes. As Mr. Bourassa states in his testimony "the DCF model has a tendency to misspecify investors required rate of return when market value of common stock differs significantly from its book value. The market-based DCF model will result in a total annual dollar return on book common equity equal to the total annual dollar return expected by investors only when market and book values are equal, but market values and book values of common stocks are rarely at unity."

Q. Do you agree with Mr. Bourassa's assertion?

No. The relationship between market-to-book ratios and the cost of equity has long been debated. It has been claimed that market based models, such as discounted cash flow, are only applicable when the market value of a company's stock is approximately equal to its book value. Others have argued that the market-to-book ratio plays no role in the determination of the fair cost of common equity. This view maintains that the differences in the actual construction of market price and book value largely explain the difference in the two values. As a result, neither the overearning myth that market to book of greater than one implies excessive returns nor the underearning myth that market to book of greater than one understate the cost of common equity are correct.

Did the Company question your calculations in preparing the DCF model? Q.

- 2 Α. 3 4 5 6 7 8 9 10
 - Yes. Mr. Bourassa testifies that I did not provide an adequate explanation as to my 8.7 percent composite median that I used in my overall DCF calculation. As stated in my direct testimony my calculations were based on four indicators of (1) Years 2009-2013 earning retention; (2) Five year average in earnings per share; (3) Years 2014, 2015, and 2017 – 2019 projections of earnings retention; and (4) Years 2011 - 2013 to 2017 - 2019 projections of EPS, DPS, and BVPS. You can see my calculations on Surrebuttal Schedule RBM-3, page 1 of 1, Col. E, Line 20. When adding the median of the proxy group adjusted yield of 2.7 percent (Col. A) of RBM --3, to perspective per share growth of 6.0 percent (Col. E) the result is 8.7 percent.

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- Have you changed the original results of the DCF Model as presented in your Q. direct testimony as compared to the your schedules included in this filing?
- Α. Yes. I have recalculated the results of my original DCF calculations from 8.68 percent to 8.71 percent.

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Q. Did Mr. Bourassa criticize your CAPM model also?

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A. Yes. I calculated the cost of equity in my CAPM to be 7.25 percent. Mr. Bourassa believes that my analysis is flawed in at least five respects. First, I incorrectly relied upon a historical risk-free rate; second, I relied on historical measures of the market risk premium rather that a forward looking market risk premium; third, the market risk premium is measured on market indices of the largest publicly traded companies and no additional risk premium is recognized for being a smaller company; fourth, I use a

historic geometric mean, which should not be used on a prospective model; and fifth, I used total returns on long-term government bonds in completing the market risk premium.

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Q. Do you concur with Mr. Bourassa's statement that your model is flawed?

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No. I will reiterate once again the components that were used when calculating the cost of equity utilizing the CAPM.

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Risk Free Rate - I use the yields on long-term Treasury bonds since this matches the long-term perspective of the cost of equity analyses. Over this three-month period.

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these bonds had an average yield of 3.47 percent.

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Betas - The most recent Value Line betas have been used in my analysis for each

12 13 company in my proxy group.

Market Risk Premium - For the purpose of estimating the market risk premium, I

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considered alternative measures of returns of the S&P 500 (a broad-based group of large U.S. companies) and 20-year U.S. Treasury bonds. I compared the actual

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annual returns on equity of the S&P 500 with the actual annual yields of U.S. Treasury

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bonds. Schedule 6, of my direct testimony, shows the return on equity for the S&P

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500 group for the period 1978-2012 (all available years reported by S&P). This

19 20 schedule also indicates the annual yields on 20-year U.S. Treasury bonds and the

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annual differentials (i.e. risk premiums) between the S&P 500 and U.S. Treasury 20-

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year bonds. Based upon these returns, I conclude that the risk premium from this

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analysis is 6.6 percent. I next considered the total returns (i.e. dividends/interest plus

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capital gains/losses) for the S&P 500 group as well as for long-term government

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bonds, as tabulated by Morningstar (formerly lbbotson Associates), using both arithmetic and geometric means. I considered the total returns for the entire 1926-2012 period, which are as follows:

	S&P 500	L-T Gov't Bonds	Risk Premium
Arithmetic	11.8%	6.1%	5.7%
Geometric	9.8%	5.7%	4.1%

I conclude from this analysis that the expected risk premium is about 5.47 percent (i.e. average of all three risk premiums: 6.6 percent from Schedule 6; 5.7 percent arithmetic and 4.1 percent geometric from Morningstar). I believe that a combination of arithmetic and geometric means is appropriate since investors have access to both types of means and presumably, both types are reflected in investment decisions and thus, stock prices and the cost of capital.

Q. What is your conclusion concerning the CAPM COE?

- A. I have not adjusted cost of equity from my direct testimony and continue to recommend 7.25 percent using the CAPM analysis.
- Q. In addition to calculating cost of equity using a DCF model and CAPM did you prepare an additional analysis?
 - Yes. While understanding that the CAPM model may have limitations I did prepare a comparable earnings analysis. The CE method is designed to measure the returns

expected to be earned on the original cost book value of similar risk enterprises, in this case the proxy company's. While Utility Source is not a public company as is the proxy group, it still provides additional support that the company will be earning a fair rate of return. The analysis was prepared from the proxy companies that were used in preparing both the DCF model and the CAPM.

REVIEW OF COMPANY'S DIRECT AND SURREBUTTAL TESTIMONY

- Q. Did Mr. Bourassa make a risk premium adjustment to his final cost of capital calculation due to the size of Utility Source?
- A. Yes. While he states in his rebuttal testimony that he has not made a specific adjustment for Utility Source, he goes on to say that "My recommendation of 11.0 percent, which is 70 basis points higher than the mid-point or my analysis of 10.3 percent, is conservative given the risks of an investment in USLLC."²

- Q. So he has included a risk premium?
- A. Yes. It appears that he has included a risk adjustment of 70 basis points.

- Q. Was the Company critical of Staff's reference to a study prepared by Ms. Annie
 Wong that addressed the financial risk of smaller utility company's?
- A. Yes. According to Mr. Bourassa "Staff's witnesses have repeatedly trotted out this one study to refute the notion that utilities like USLLC are more risky than the proxy

² Mr. Bourassa's Rebuttal Testimony, Page 7

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⁵ Transcript, Volume V, Docket No. W-01445A-11-0310, Pages 913 to 920

companies because they are considerably and significantly smaller." Mr. Bourassa goes on to say that "Ms. Wong's work, and its questionable conclusions, have found no greater audience than at public utility commissions where some party is trying to justify an unreasonably low ROE for a utility that is not publicly traded."³

Q. Does Mr. Bourassa refute the findings as presented by Ms. Wong?

A. Yes. Ms. Wong's study has been criticized soundly according to Mr. Bourassa. As his principle support Mr. Bourassa references an article published by Dr. Thomas M. Zepp that concluded "when a stock is thinly traded, its stock price does not reflect the movement of the market, which drives down the covariance with the market and creates an artificially low beta estimate." "Thus, Ms. Wong's weak results were due to a flawed analysis."

Has Dr. Zepp presented testimony in any rate proceedings before the Arizona Corporation Commission?

Yes. Dr. Zepp has provided expert cost of capital testimony before the ACC on several occasions. The most recent case being Arizona Water Company, in Docket No. W-01445A-11-0310. Staff questioned Dr. Zepp's conclusions in five rate cases he has provided cost of capital testimony. In all cases Dr. Zepp has recommended a risk premium and in all five cases his recommended rate of return was not adopted.⁵

- Q. Didn't Staff also ask Dr. Zepp if his recommendations, as testified to before the ACC, had ever been adopted?
- A. Per Dr. Zepp when asked that very question by Staff his response was "No."6
- Q. What is your conclusion on Mr. Bourassa's referencing Dr. Zepps article as published?
- A. While understanding that Dr. Zepp is a very well recognized expert in the field of providing utility cost of capital testimony, relying on his article to refute Ms. Wong's study, may also be flawed. As noted, the times that Dr. Zepp has provided testimony in Arizona, his expert knowledge and recommendations have never been adopted. This could very well mean that while he is an expert in his field his recommendations and conclusions may be given little if any weight and not accepted in Arizona.

Q. Did Mr. Bourassa prepare a CAPM in his analysis?

A. Yes, a CAPM was prepared by Mr. Bourassa. In his analysis he used 30-year long term Treasury bond rate of 4.40 percent. The Treasury yield as of October 1, 2014 was 3.12 percent and has continued to drop throughout the month. Mr. Bourassa has overstated his yield rates significantly in his analysis and his cost of equity is overstated as a well.

⁶ Transcript, Volume V, Docket No. W-01445A-11-0310, Page 920

- Q. Can you please comment on Mr. Bourassa's preparation of the DCF model included in his testimony?
- A. Yes. In reviewing his DCF model it appears that Mr. Bourassa has relied solely on analyst's forecast of future earnings growth to forecast the DPS in his calculations.

 Analysts have the tendency to be very optimistic in forecasting earnings and relying only on analyst's projections of growth will inflate the DPS component of the model and will has the effect of inflating the estimated cost of equity.
- Q. Mr. Mease, does this conclude your surrebuttal testimony on cost of capital and rate of return for Utility Source, LLC?
- A. Yes it does.

ATTACHMENT A

TABLE OF CONTENTS - SURREBUTTAL

Schedule Number	
RBM - 1	Weighted Average Cost of Capital
RBM - 2	Cost of Capital Summary Calculations
RBM - 3	Discounted Cash Flow Model
RBM - 4	Capital Asset Pricing Model
RBM - 5	Comparable Earnings Comparison

SURREBUTTAL RBM - 1 Page 1 of 1

WEIGHTED AVERAGE COST OF CAPITAL

Line <u>No</u>	DESCRIPTION	COST			WEIGHED COST	
1	Long Tern Debt	\$	_	\$		_
2						
3	Common Equity	9.2	25%		9	.25%
4						
5	TOTAL CAPITALIZATION	 9.2	25%		9	.25%
6		 		,		
7						
8	References:					
9	RBM - 2, Ln 15					

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Column A - Ln 9 RBM - 5

SURREBUTTAL RBM - 2 Page 1 of 1

Cost of Capital Summary Calculations

Line <u>No</u>			(A)
1	DCF METHODOLOGY	<u>(</u>	
2			
3	DCF - Water Company	y Single Stage Constant Growth Model	8.71%
4			
5	CAPM METHODOLOG	<u>GY</u>	
6			
7	CAPM - Water Compa	any Estimate	7.24%
8			
9	COMPARABLE EARN	<u>IINGS</u>	9.75%
10			
11	AVERAGE OF THE T	HREE METHODS (Avg. Lines 3, 7 and 11)	8.55%
12			
13	PREMIUM ADJUSTM	ENT - See Testimony	0.70%
14			
15	FINAL COST OF EQU	JITY / WEIGHTED AVERAGE COST OF CAPITAL	9.25%
16			
17			
18	References:		
19	Column A - Ln 3	RBM - 3, Col. E, Line 20	
20	Column A - Ln 7	RBM - 4, Col. E, Line 9	

Doc	(CC 110. 110-0-1200A-10-0501								ragerori
				<u> i</u>	DCF ANALYSIS	<u> </u>			
		(A)	(B) HISTORIC	(C) PROSPECTIVE	(D) HISTORIC	(E) PROSPECTIVE	(F) FIRST CALL	(G)	(H)
Line <u>No</u>	COMPANY	ADJUSTED <u>YIELD</u>	RETENTION GROWTH	RETENTION GROWTH	PER SHARE GROWTH	PER SHARE GROWTH	EPS GROWTH	AVERAGE GROWTH	DCF RATES
1									
2	American States Water Co.	2.7%	5.5%	5.5%	8.7%	6.5%	2.0%	5.6%	8.3%
3	Aqua America, Inc.	2.6%	4.4%	6.5%	8.0%	7.7%	5.8%	6.5%	9.0%
4	California Water Service Group	2.8%	3.2%	4.3%	3.3%	6.3%	6.0%	4.6%	7.4%
5	Connecticut Water Service, Inc.	3.0%	2.4%	3.7%	6.0%	4.5%	5.0%	4.3%	7.3%
6	Middlesex Water	1.5%	1.5%	3.0%	2.0%	3.0%	2.7%	2.4%	3.9%
7	SJW Corporation	2.6%	2.4%	3.8%	1.8%	6.0%	14.0%	5.6%	8.2%
8	York Water Company	2.8%	2.4%	4.2%	4.2%	5.0%	4.9%	4.1%	6.9%
9									
10									
11	Mean	2.6%	3.1%	4.4%	4.9%	5.6%	5.8%	4.7%	7.3%
12									
13			•						
14	Median	2.7%	2.4%	4.2%	4.2%	6.0%	5.0%	4.6%	7.4%
15									
16									
17	Composite-Mean		5.7%	7.0%	7.4%	8.1%	8.3%	7.3%	
18									
19									
20	Composite-Median		5.1%	6.9%	6.9%	8.7%	7.7%	7.3%	
21									

22 23 24 References: 25 Value Line Investment Survey 26

SURREBUTTAL RBM - 4 Page 1 of 1

CAPM

Line		(A) RISK-FREE	(B)		(C) Risk		(D) CAPM	(E) CAPM COST OF
<u>No</u>	COMPANY	RISK-FREE RATE	BETA		Premium		Rates	EQUITY CAPITAL
1	American States Water Co.	3.33%	0.70	X	5.47%	=	3.83%	7.16%
2	Aqua America, Inc.	3.33%	0.70	X	5.47%	=	3.83%	7.16%
3	California Water Service Group	3.33%	0.70	X	5.47%	=	3.83%	7.16%
4	Connecticut Water Service, Inc.	3.33%	0.65	X	5.47%	=	3.56%	6.89%
5	Middlesex Water	3.33%	0.70	X	5.47%	=	3.83%	7.16%
6	SJW Corporation	3.33%	0.80	X	5.47%	=	4.38%	7.71%
7	York Water Company	3.33%	0.75	Х	5.47%	=	4.10%	7.43%
8								
9	Mean							7.24%
10								
11	Median							7.16%
12								
13								
14								
15								
16	References:							
17	Column (A) - Federal Reserve Sele	cted Interest Rates (V	Veekly) - H.15	- Tre	asury Constant	Maturities	s 20-year	
18	Column (B) - Value Line Investment	Survey Ratings and	Reports July	18, 20	14			
19	Column (C) - See testimony							

SURREBUTTAL RBM - 5 Page 1 of 1

PROXY UTILITIES

RATES OF RETURN ON AVERAGE COMMON EQUITY - COMPARABLE EARNINGS

	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
Value Line Water Group										
American States Water Co.	14.0%	11.7%	9.5%	10.0%	10.0%	9.4%	9.5%	10.2%	9.6%	10.5%
Agua America, Inc.	11.0%	11.4%	11.2%	12.0%	11.8%	12.5%	14.2%	13.8%	13.0%	14.09
California Water Service Group	10.4%	12.6%	10.6%	10.0%	12.6%	14.5%	11.0%	11.4%	10.3%	7.5%
Connecticut Water Service, Inc.	12.1%	12.5%	12.6%	12.7%	12.4%	12.3%	12.2%	12.4%	11.8%	13.39
Middlesex Water	11.7%	12.6%	12.1%	12.0%	10.3%	11.2%	10.7%	10.2%	6.5%	9.0%
SJW Corporation	11.8%	11.8%	9.6%	10.8%	16.2%	12.0%	11.6%	11.1%	9.6%	9.5%
York Water Company	11.9%	12.6%	11.7%	10.7%	11.1%	10.9%	10.3%	10.3%	11.9%	11.5%
Mean	11.8%	12.2%	11.0%	11.2%	12.1%	11.8%	11.4%	11.3%	10.4%	10.8%
Median	11.8%	12.5%	11.2%	10.8%	11.8%	12.0%	11.0%	11.1%	10.3%	10.5%
COMPANY	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Value Line Water Group										
-	9.6%	5.6%	8.0%	10.4%	8.2%	9.3%	7.2%	8.8%	9.0%	11.7%
American States Water Co.	9.6% 13.9%	5.6% 12.3%	8.0% 11.4%	10.4% 11.5%	8.2% 11.0%	9.3% 10.0%	7.2% 9.6%	8.8% 9.6%	9.0% 10.9%	
American States Water Co. Aqua America, Inc.										11.8%
American States Water Co. Aqua America, Inc. California Water Service Group	13.9%	12.3% 8.7% 11.2%	11.4%	11.5%	11.0%	10.0%	9.6%	9.6%	10.9%	11.8% 8.5%
American States Water Co. Aqua America, Inc. California Water Service Group Connecticut Water Service, Inc.	13.9% 9.6%	12.3% 8.7% 11.2% 8.2%	11.4% 9.8%	11.5% 9.3%	11.0% 7.6%	10.0% 4.9%	9.6% 10.1%	9.6% 7.4%	10.9% 8.8%	11.8% 8.5% 9.7%
American States Water Co. Aqua America, Inc. California Water Service Group Connecticut Water Service, Inc. Middlesex Water	13.9% 9.6% 11.6%	12.3% 8.7% 11.2%	11.4% 9.8% 11.4%	11.5% 9.3% 12.0%	11.0% 7.6% 7.5%	10.0% 4.9% 8.9%	9.6% 10.1% 9.2%	9.6% 7.4% 9.7%	10.9% 8.8% 8.8%	11.8% 8,5% 9.7% 7.6%
American States Water Co. Aqua America, Inc. California Water Service Group Connecticut Water Service, Inc. Middlesex Water SJW Corporation	13.9% 9.6% 11.6% 9.8%	12.3% 8.7% 11.2% 8.2%	11.4% 9.8% 11.4% 8.3%	11.5% 9.3% 12.0% 8.4%	11.0% 7.6% 7.5% 8.6%	10.0% 4.9% 8.9% 8.8%	9.6% 10.1% 9.2% 8.8%	9.6% 7.4% 9.7% 7.0%	10.9% 8.8% 8.8% 9.0%	11.7% 11.8% 8.5% 9.7% 7.6% 8.0% 9.7%
American States Water Co. Aqua America, Inc. California Water Service Group Connecticut Water Service, Inc. Middlesex Water SJW Corporation York Water Company	13.9% 9.6% 11.6% 9.8% 9.4%	12.3% 8.7% 11.2% 8.2% 9.8%	11.4% 9.8% 11.4% 8.3% 11.3%	11.5% 9.3% 12.0% 8.4% 11.5%	11.0% 7.6% 7.5% 8.6% 18.2%	10.0% 4.9% 8.9% 8.8% 8.3%	9.6% 10.1% 9.2% 8.8% 11.2%	9.6% 7.4% 9.7% 7.0% 6.0%	10.9% 8.8% 8.8% 9.0% 9.6%	11.8% 8.5% 9.7% 7.6% 8.0% 9.7%
American States Water Co. Aqua America, Inc. California Water Service Group Connecticut Water Service, Inc. Middlesex Water SJW Corporation York Water Company Mean	13.9% 9.6% 11.6% 9.8% 9.4% 16.7%	12.3% 8.7% 11.2% 8.2% 9.8% 11.7%	11.4% 9.8% 11.4% 8.3% 11.3% 12.2%	11.5% 9.3% 12.0% 8.4% 11.5% 11.8%	11.0% 7.6% 7.5% 8.6% 18.2% 10.5%	10.0% 4.9% 8.9% 8.8% 8.3% 9.7%	9.6% 10.1% 9.2% 8.8% 11.2% 9.4%	9.6% 7.4% 9.7% 7.0% 6.0% 9.6%	10.9% 8.8% 8.8% 9.0% 9.6% 10.0%	11.8% 8.5% 9.7% 7.6% 8.0%
Value Line Water Group American States Water Co. Aqua America, Inc. California Water Service Group Connecticut Water Service, Inc. Middlesex Water SJW Corporation York Water Company Mean Median	13.9% 9.6% 11.6% 9.8% 9.4% 16.7%	12.3% 8.7% 11.2% 8.2% 9.8% 11.7%	11.4% 9.8% 11.4% 8.3% 11.3% 12.2%	11.5% 9.3% 12.0% 8.4% 11.5% 11.8%	11.0% 7.6% 7.5% 8.6% 18.2% 10.5%	10.0% 4.9% 8.9% 8.8% 8.3% 9.7%	9.6% 10.1% 9.2% 8.8% 11.2% 9.4%		9.6% 7.4% 9.7% 7.0% 6.0% 9.6%	9.6% 10.9% 7.4% 8.8% 9.7% 8.8% 7.0% 9.0% 6.0% 9.6% 9.6% 10.0%

COMPANY	2012	1992-2001 Average	2002-2008 Average	2009-2012 Average	2013	2014	2016-2018
Value Line Water Group							
American States Water Co.	11.8%	10.4%	8.3%	10.3%	12.5%	12.0%	11.5%
Aqua America, Inc.	13.0%	12.5%	11.4%	11.3%	12.0%	12.0%	12.5%
California Water Service Group	9.8%	11.1%	8.6%	8.6%	7.0%	8.0%	9.5%
Connecticut Water Service, Inc.	11.2%	12.4%	10.3%	9.9%	9.0%	9.5%	8.5%
Middlesex Water	7.5%	10.6%	8.7%	7.8%	8.0%	8.5%	9.0%
SJW Corporation	8.6%	11.4%	11.4%	8.1%	8.5%	8.5%	8.5%
York Water Company	9.1%	11.3%	11.7%	9.6%	9.5%	10.0%	10.0%
Mean	10.1%	11.4%	10.0%	9.4%	9.5%	9.8%	9.9%
Median	9.8%	11.3%	9.9%	9.3%	9.0%	9.5%	9.5%

UTILITY SOURCE, LLC DOCKET NO. WS-04235A-13-0331

OF
JEFFREY M. MICHLIK

ON BEHALF OF
THE
RESIDENTIAL UTILITY CONSUMER OFFICE

OCTOBER 20, 2014

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EXECUTIVE SUMMARY - SURREBUTTAL

The Residential Utility Consumer Office ("RUCO") has reviewed Utility Source, LLC's ("Company") rebuttal testimony and has made several adjustments based on additional information provided by the Company. RUCO will address the Company's rebuttal issues for rate base, operating income, revenue requirement, and rate design testimonies.

Water Division:

The following are the Company's and RUCO's proposed rate base and adjusted operating income positions as filed in its direct, rebuttal, and surrebuttal testimonies for the Water Division.

Rate Base

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
\$1,566,542	\$1,575,194	\$1,566,542	\$1,575,194

Adjusted Operating Income

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
\$(8,265)	\$(5,885)	\$(8,998)	\$11,103

The following tables present the required gross revenue increase as filed by the Company and RUCO in their direct, rebuttal, and surrebuttal testimonies.

Required Dollar Increase in Gross Revenues

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
\$228,447	\$226,783	\$155,605	\$136,091

Required Percentage Increase in Gross Revenues

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
109.83%	109.99%	74.81%	66.00%

The Company is requesting a rate of return of 11.00 percent in its rebuttal testimony on its fair value rate base ("FVRB") of \$1,575,194. RUCO is proposing a rate of return of 9.25 percent on the FVRB of \$1,575,194.

Under RUCO's recommended rates, a residential 3/4-inch metered customer with an average usage of 4,123 gallons per month will pay \$59.01, which is \$20.43 more than the current \$38.58 or a 52.95 percent increase. By comparison, a residential 3/4-inch metered customer with an average usage of 4,123 gallons per month under the Company's proposed rates would be billed \$75.54, which is \$36.96 more than the current \$38.58 or an increase of 95.81 percent.

Wastewater Division:

The following are the Company's and RUCO's proposed rate base and adjusted operating income positions as filed in its direct, rebuttal, and surrebuttal testimonies for the Wastewater Division.

Rate Base

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
\$830,945	\$825,856	\$830,945	\$825,856

Adjusted Operating Income

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
\$(72,257)	\$(83,387)	\$(85,383)	\$(81,884)

The following tables present the required gross revenue increase as filed by the Company and RUCO in their direct, rebuttal, and surrebuttal testimonies.

Required Dollar Increase in Gross Revenues

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
\$228,447	\$209,436	\$155,605	\$160,060

Required Percentage Increase in Gross Revenues

Company	Company	RUCO	RUCO
Direct	Rebuttal	Direct	Surrebuttal
162.23%	175.31%	135,28%	

The Company is requesting a rate of return of 11.00 percent in its rebuttal testimony on its fair value rate base ("FVRB") of \$825,856. RUCO is proposing a rate of return of 9.25 percent on the FVRB of \$825,856.

Under RUCO's recommended rates, a residential wastewater customer with an average usage of 4,123 gallons per month will pay \$57.30, which is \$33.23 more than the current \$24.08 or a 138.00 percent increase. By comparison, a residential wastewater customer with an average usage of 4,123 gallons per month under the Company's proposed rates would be billed \$74.91, which is \$50.83 more than the current \$24.08 or an increase of 211.13 percent.

Other Issues:

Standpipe

RUCO recommends that the Company file a yearly report by September 30th of each year, which shows the revenue generated by month from the Company's standpipe. Further, RUCO recommends that if the Company is over-earning it be addressed, trued-up, and any excess be refunded to ratepayers in the Company's next rate case.

Rate Case Expense Surcharge

RUCO, consistent with the language in Decision No. 73573, recommends that the Commission implement a rate case recovery surcharge of \$4.271 per customer for the Water Division and a rate case recovery surcharge of \$4.25 for the Wastewater Division with the surcharge remaining in place for either (1) a period of 36 months, or (2) until the Company has collected \$50,000 in rate case expense recovery from both Divisions, whichever comes first.

¹ Water Division - \$50,000 rate case expense / 325 customers / 36 months. Wastewater Division - \$50,000 rate case expense / 327 customers / 36 months.

1	INTRO	ODUCTION
2	Q.	Please state your name for the record.
3	A.	My name is Jeffrey M. Michlik.
4		
5	Q.	Have you previously filed testimony regarding this docket?
6	A.	Yes, I have. I filed direct testimony in this docket on September 4, 2014.
7		
8	Q.	What is the purpose of your surrebuttal testimony?
9	A.	My surrebuttal testimony will address the Company's rebuttal positions,
10		proposals and comments pertaining to the adjustments RUCO
11		recommended in direct testimony. In addition, my surrebuttal testimony will
12		also include additional adjustments that RUCO is now recommending.
13		
14	Q.	What areas will you address in your surrebuttal testimony?
15	Α.	My surrebuttal testimony will address RUCO's recommended rate base,
16		operating income, revenue requirement, and rate design.
17		
18	Q.	How is your surrebuttal testimony organized?
19	Α.	My surrebuttal testimony is presented in four sections. Section I addresses
20		surrebuttal rate base adjustments. Section II addresses surrebuttal
21		operating income adjustments. Section III rate design and Section IV
22		addresses other issues.
23		
24	Q.	Please identify the schedules that you are sponsoring in RUCO's
25		surrebuttal testimony.
26	A.	I am sponsoring surrebuttal schedules JMM-1 through JMM-17.

1	ı. Su	RREBUT	TAL RATE BA	ASE A	DJUSTME	NTS			
2	Q.	Please	summarize	the	number	of	rate	base	adjustments
3		recomm	nended by RU	CO in	its surrebu	uttal	testim	ony.	
4	A.	RUCO is	s now recomm	ending	three rate	base	adjust	ments in	its surrebutta
5		testimon	ıy.						
6			·						
7	Wate	r Divisioı	า						
8	Q.	Can yo	u please ider	ntify th	ne rate ba	se a	djustn	nents al	ong with the
9		dollar a	mounts that R	UCO i	s recomm	endiı	ng for	the Com	npany's Wateı
10		Division	1?						
11	Α.	Yes, ple	ase see the ta	ble be	low that su	ımma	rizes F	RUCO's	recommended
12		rate bas	e adjustments:						
13									
14		Rate Ba	se Adjustmer	its (Ne	<u>et)</u>				
15		<u>Adjustme</u>	ent No. / Descript	ion					
16		1 – Adjust	ment to Accumula	ated Dep	oreciation				\$9,919
17		2 – Adjust	ment to Accumula	ated Am	ortization of				(1,267)
18		Contribution	ons in Aid of Cons	struction					
19		3 – Not Us	sed						0
20		RUCO To	tal Recommende	d Rate E	Base Adjustm	ents			<u>\$8,652</u>
21		See Surre	buttal Schedule J	MM-3.					
22									
23									
24									
25									
26									

		buttal Testin et No. WS-0			ichlik				
1	Rate	Base Ad	justme	nt No. 1 -	- Acc	umulated De	oreciation		
2	Q.	Does	RUCO	accept	the	Company's	accumulated	d	epreciation
3		adjustn	nent?						
4	A.	Yes, as	shown	in schedu	ıle JIV	IM-4.			
5									
6	Rate	Base Ad	<u>justme</u> i	nt No. 2 -	- Acc	umulated Ame	ortization of Co	nt	ributions in
7	Aid o	of Constru	uction ("CIAC")					
8	Q.	Does R	UCO ac	cept the	Com	pany's adjust	tment to CIAC?)	
9	A.	Yes, as	shown	in schedu	ıle JM	IM-5.			
10									
11	<u>Rate</u>	Base Ad	<u>justme</u> i	<u>nt No. 3 -</u>	- Not	<u>Used</u>			
12									
13	Was	tewater D	ivision						
14	Q.	Can yo	u pleas	se identi	fy the	e rate base a	adjustments al	on	g with the
15		dollar a	amount	s that F	RUCO	is recomm	ending for the) (Company's
16		Wastew	ater Di	vision?					
17	A.	Yes, ple	ase see	the tabl	e belo	ow that summa	arizes RUCO's	rec	commended
18		rate bas	e adjust	ments:					
19		Rate Ba	se Adjı	ustments	(Net)			
20		Adjustme	ent No. / I	Descriptio	<u>n</u> _				
21		1 – Adjust	ment to A	Accumulate	d Depr	eciation		\$	28
22		2 – Adjust	ment to A	\ccumulate	d Amo	rtization of			(4)
23		Contribution	ons in Aic	of Constru	uction				

<u>5,065</u>

<u>\$5,089</u>

3 - Customer Security Deposits

See Surrebuttal Schedule JMM-3.

RUCO Total Recommended Rate Base Adjustments

24

25

1	Rate I	Base Adjustment No. 1 – Accumulated Depreciation
2	Q.	Does RUCO accept the Company's accumulated depreciation
3		adjustment?
4	A.	Yes, as shown in schedule JMM-4.
5		'
6	Rate I	Base Adjustment No. 2 – Accumulated Amortization of Contributions in
7	<u>Aid o</u>	f Construction ("CIAC")
8	Q.	Does RUCO accept the Company's adjustment to CIAC?
9	Α.	Yes, as shown in schedule JMM-5.
10		
11	Rate	Base Adjustment No. 3 – Customer Meter Deposits
12	Q.	Does RUCO accept the Company's adjustment to Customer Meter
13		Deposits?
14	A.	Yes, as shown in schedule JMM-6.
15		
16	II. SU	RREBUTTAL OPERATING INCOME ADJUSTMENTS
17	Q.	Please summarize the number of operating income adjustments
18		recommended by RUCO in its surrebuttal testimony?
19	Α.	RUCO is recommending 7 income adjustments in its surrebuttal testimony.
20		
21	Wate	r Division
22	Q.	Can you please identify the operating income adjustments along with
23		the dollar amounts that RUCO is recommending for the Company's
24		Water Division?
25	A.	Yes, please see the table below that summarizes RUCO's recommended
26		operating income adjustments:

Operating Income Adjustments (Net) 1 2 Adjustment No. / Description \$(1,820) 3 1 - Other Operating Revenue 2 - Water Testing Expense 7,733 4 10,000 5 3 - Rate Case Expense 4,116 6 4 - Miscellaneous Expense 637 7 5 - Depreciation Expense 784 8 6 - Property Expense (2,064)9 7 - Income Tax Expense \$19,386 10 RUCO Total Recommended Operating Income adjustments 11 See Surrebuttal Schedule JMM-8. 12 Operating Income Adjustment No. 1 – Other Operating Revenue 13 Does RUCO accept the Company's Other Operating Revenue 14 Q. 15 adjustment? Yes, as shown in schedule JMM-9. 16 A. 17 Operating Income Adjustment No. 2 - Water Testing Expense 18 19 Q. Please explain RUCO's operating income adjustment No. 2? Based on the direct testimony of Staff witness Michael Thompson, RUCO 20 Α. has adjusted the water testing expenses for the reason cited in Mr. 21 22 Thompson's testimony. 23 24 25

- Q. Did the Company use one vendor (Western Technologies) for both its water and wastewater testing?

 A. Yes.
 - Q. Does the total on the Staff Engineering report reconcile to the General Ledger?
 - A. No. RUCO adjusted the January invoice from Western Technologies downward by \$826 to remove testing expenses relating to the prior test year, and made a downward miscellaneous adjustment of \$9 to reconcile to the test year general ledger amount of \$13,776 for water and wastewater testing expense. Stated another way, test year water testing expenses for the water division should be \$236 and test year wastewater testing expenses should be \$13,540.

Q. What is RUCO's surrebuttal recommendation?

A. Based on Staff's engineering report, RUCO recommends decreasing water testing expense by \$7,733 from \$8,107 to \$374, as shown in RUCO surrebuttal schedule JMM-10. The \$1,096 of map expense is already included in a separate line item in general ledger account 675.5 Process/Bonds/Permits. Thus the \$374 plus the \$1,096 equals the \$1,470 recommended in Staff's engineering report for the water division.

1	Operating Income Adjustment No. 3 – Rate Case Expense			
2	Q.	Is RUCO recommending an adjustment to Rate Case Expense?		
3	A.	Yes. RUCO recommends the use of a rate case expense recovery		
4		surcharge as discussed in the other issues sections to recover rate case		
5		expense.		
6				
7	<u>Oper</u>	ating Income Adjustment No. 4 – Miscellaneous Expense - Automobile		
8	<u>Expe</u>	Expense and Telephone Expense		
9	Q.	Did RUCO propose an adjustment to automobile expense or telephone		
10		expense in its direct testimony?		
11	A.	No. However, after reading the direct testimony of Staff witness Jorn Keller,		
12		RUCO agrees with these adjustments.		
13				
14	Q.	What is RUCO's surrebuttal recommendation?		
15	A.	Based on Staff's testimony RUCO recommends reducing miscellaneous		
16		expense for the water division by \$4,116 (i.e. \$1,750 auto expense plus		
17		\$2,366 telephone expense) from \$19,976 to \$15,860, as shown in		
18		surrebuttal schedule JMM-12.		
19				
20	Operating Income Adjustment No. 5 – Depreciation Expense			
21	Q.	Did you explain RUCO's calculation of depreciation expense in direct		
22		testimony?		
23	A.	Yes.		
24				
25				
26				

1	Operating Income Adjustment No. 6 – Property Tax Expense		
2	Q.	Did you address RUCO's property tax adjustment in direct	t testimony?
3	A.	Yes.	
4			
5	<u>Оре</u>	rating Income Adjustment No. 7 – Income Tax Expense	
6	Q.	Did you address RUCO's income tax adjustment in direct	testimony?
7	Α.	Yes.	
8			
9	Wastewater Division		
10	Q.	Can you please identify the operating income adjustment	s along with
11	l.	the dollar amounts that RUCO is recommending for the	Company's
12		Wastewater Division?	
13	A.	Yes, please see the table below that summarizes RUCO's re	ecommended
14		operating income adjustments:	
15	l		
16		Operating Income Adjustments (Net)	
17		Adjustment No. / Description	
18		1 – Other Operating Revenue	\$(1,820)
19		2 – Wastewater Testing Expense	(8,858)
20		3 – Miscellaneous Expense	4,116
21		4 – Rate Case Expense	10,000
22		5 – Not Used	0
23		6 – Property Expense	480
24		7 – Income Tax Expense	(13,545)
25		RUCO Total Recommended Operating Income adjustments	<u>\$(9,627)</u>
26		See Surrebuttal Schedule JMM-8.	

1	<u>Opera</u>	ating Income Adjustment No. 1 – Other Operating Revenue
2	Q.	Does RUCO accept the Company's Other Operating Revenue
3		adjustment?
4	A.	Yes, as shown in schedule JMM-9.
5	l.	
6	<u>Opera</u>	ating Income Adjustment No. 2 – Wastewater Testing Expense
7	Q.	Please explain RUCO's operating income adjustment No. 2?
8	A.	Based on the direct testimony of Staff witness Michael Thompson, RUCO
9		has adjusted the wastewater testing expenses for the reason cited in Mr.
10		Thompson's testimony.
11		
12	Q.	Did the Company, use one vendor (Western Technologies) for both its
13		water and wastewater testing?
14	A.	Yes.
15		
16	Q.	Does the total on the Staff Engineering report reconcile to the General
17		Ledger?
18	A.	No. RUCO adjusted the January invoice from Western Technologies
19		downward by \$826 to remove testing expenses relating to the prior test
20		year, and made a downward miscellaneous adjustment of \$9 to reconcile
21		to the test year general ledger amount of \$13,776 for water and wastewater
22		testing expense. Stated another way, test year water testing expenses for
23		the water division should be \$236 and test year wastewater testing
24		expenses should be \$13,540.
25		
26		

	II .		
1	Q.	What is RUCO's surrebuttal recommendation?	
2	Α.	Based on Staff's engineering report RUCO, recommends increasing	
3		wastewater testing expense by \$8,858 from \$5,669 to \$14,527, as shown	
4		in RUCO surrebuttal schedule JMM-10.	
5			
6	<u>Oper</u>	ating Income Adjustment No. 3 – Rate Case Expense	
7	Q.	Is RUCO recommending an adjustment to Rate Case Expense?	
8	Α.	Yes. RUCO recommends the use of a rate case expense recovery	
9		surcharge as discussed in the other issues sections to recover rate case	
10		expense.	
11			
12	Operating Income Adjustment No. 4 – Miscellaneous Expense - Automobile		
13	Expense and Telephone Expense		
14	Q.	Did RUCO propose an adjustment to automobile expense or telephone	
15		expense in its direct testimony?	
16	A.	No. However, after reading the direct testimony of Staff witness Jorn Keller,	
17		RUCO agrees with these adjustments.	
18			
19	Q.	What is RUCO's surrebuttal recommendation?	
20	Α.	Based on Staff's testimony RUCO recommends reducing miscellaneous	
21		expense for the wastewater division by \$4,116 (i.e. \$1,750 auto expense	
22		plus \$2,366 telephone expense) from \$13,152 to \$9,036, as shown in	
23		RUCO surrebuttal schedule JMM-12.	
24			
25			
26			

Operating Income Adjustment No. 5 – Not Used 1 2 3 Operating Income Adjustment No. 6 – Property Tax Expense 4 Q. Did you address RUCO's property tax adjustment in direct testimony? 5 A. Yes. 6 7 Operating Income Adjustment No. 7 – Income Tax Expense 8 Q. Did you address RUCO's income tax adjustment in direct testimony? 9 Α. Yes. 10 11 III. Rate Design 12 Q. Have you read the rebuttal testimony of Company witness Mr. 13 Bourassa and the direct testimony of Staff witness Mr. Keller? 14 Α. Yes. 15 16 Water Division 17 Q. Do you have any comments? 18 Α. Yes. Not surprisingly, Mr. Bourassa uses the old revenue stability argument 19 that the Company will not be able to recover its authorized return if too much 20 of the customers rate is recovered through the commodity rate and not 21 enough is recovered through the monthly minimum rate. Further, Mr. 22 Bourassa states that RUCO's rate design only recovers about 35 percent in 23 the monthly minimum.² 24 25

² See Rebuttal Testimony of Mr. Bourassa, page 19 line 20.

Q. Can you put this into perspective?

A. Yes. It is true that when you combine the 3/4 Inch Residential Customer, the 3/4 Inch Commercial Customer, 2 Inch Commercial Customer, 2 Inch Irrigation, and standpipe/bulk water customer(s) the rate design only recovers 35 percent in the monthly minimum. However, the monthly minimum recovered from the 3/4 Inch Residential Customer is approximately 43.62 percent. The 3/4 Inch Residential Customer represents over 75 percent of the Company's revenue.

Q. Do you believe revenue stability is an issue in this case?

A. No. First the difference in the monthly minimum is negligible less than 5 percent.³ Second, under RUCO's rate design customers have a greater opportunity to conserve. Third RUCO's rate design sends the right price signal that water is a scarce and precious commodity, and customers who conserve are rewarded through a lower price and those that do not are charged more.

Q. Would you please summarize RUCO's surrebuttal recommended rate design for the 3/4-inch residential customer?

A. Yes. RUCO recommends a monthly minimum charge for a 3/4-inch residential customer of \$29.00. No gallons are included in the monthly minimum charge. RUCO recommends a residential water commodity rate for the 3/4-inch residential customer of \$7.10 per thousand gallons for 1 to 3,000 gallons, \$13.08 per thousand gallons for 3,001 to 9,000 gallons, and

³ This holds true for the 3/4 inch residential customer, the Company proposes approximately 47.68 percent be recovered in the monthly minimum.

\$17.40 per thousand gallons for any consumption over 9,000 gallons. For a complete schedule of rates see RUCO schedule JMM-16.

- Q. Did RUCO prepare a typical bill analysis for a 3/4 inch customer based on its surrebuttal testimony?
- A. Yes. Please see schedule JMM-17.
- Q. What is the rate impact on a 3/4 inch meter residential customer using an average consumption of 4,123 gallons?
- A. Under RUCO's recommended rates, a residential 3/4-inch metered customer with an average usage of 4,123 gallons per month will pay \$59.01, which is \$20.43 more than the current \$38.58 or a 52.95 percent increase. By comparison, a residential wastewater customer with an average usage of 4,123 gallons per month under the Company's proposed rates would be billed \$75.54, which is \$36.96 more than the current \$38.58 or an increase of 95.81 percent.

Wastewater Division

- Q. Do you have any comments?
- A. Yes. RUCO is not sure if Staff is recommending a flat rate for the residential wastewater customer of \$65 with no commodity or if this was a mistake. Even though RUCO does not agree with the Company's wastewater rate design, it appears to be better than the rate design recommended by Staff.

Q. Can you put this into perspective?

- A. Yes. The current rates are based on 1,000 gallon usage, with no monthly minimum. Even the Company gives the customer some ability to control their wastewater bill, albeit a small one, with approximately 70 percent of the revenue recovered in the monthly minimum and 30 percent in the commodity rate for the residential wastewater customer. Staff's wastewater design does not provide the wastewater customer an opportunity to conserve. Both the Staff and Company give customers who pour more water down the drain a break. Under Staff's more aggressive rate design if the customer uses more than 12,000 gallons you get a refund, so much for conservation. In addition, Staff's rate design assigns the same commodity rate to all commercial and industrial customers, in other words there is no difference between laundromat and restaurant customers.
- Q. Would you please summarize RUCO's surrebuttal recommended rate design for the residential wastewater customer?
- A. Yes. RUCO recommends a commodity rate of \$13.90⁴ per 1,000 gallons for the residential wastewater customer. For a complete schedule of rates see RUCO schedule JMM-16.
- Q. Did RUCO prepare a typical bill analysis for a residential wastewater customer based on its surrebuttal testimony?
- A. Yes. Please see schedule JMM-17.

⁴ Rounded

	i i	
1	Q.	What is the rate impact on a residential wastewater customer using an
2		average consumption of 4,123 gallons?
3	Α.	Under RUCO's recommended rates, a residential wastewater customer
4		with an average usage of 4,123 gallons per month will pay \$57.30, which is
5		\$33.23 more than the current \$24.08 or a 138.00 percent increase. By
6		comparison, a residential 3/4-inch metered customer with an average
7		usage of 4,123 gallons per month under the Company's proposed rates
8		would be billed \$74.91, which is \$50.83 more than the current \$24.08 or an
9		increase of 211.13 percent.
10		
11	IV. 01	ther Issues
12	Stanc	dpipe
13	Q.	Do you have anything additional to add to your surrebuttal testimony
14		in regards to revenues generated by the new standpipe?
15	Α.	Yes. The Company stated in a data request that the standpipe went into
16		operation on September 4, 2014.
17		
18	Q.	Has the Company provided any information as to revenues generated
19		from the new standpipe?
20	A.	No.
21		
22		
23		
24		
25		

- Q. Does RUCO agree with Staff's recommendation that the Company be required to file a rate case in three years rather than five years as proposed by the Company in order to report activity of the proposed standpipe?
- A. No, by increasing the rate case expense to be recovered over three years instead of five, provides no guarantee the Company will file at the end of the three year period. I have seen far too many delays and request for extensions by Companies in similar situations. Likewise, there simply is no guarantee that the Company will generate any significant revenues from the standpipe. Moreover, when the Company files a new rate case in 3 years instead of 5 years, customers may have to endure another rate increase sooner than later.

Q. Please elaborate?

A. If Staff believes the Company is over-earning they can ask the Commission to order the Company to file a rate case. RUCO recommends that the Company file a yearly report by September 30th of each year which shows the revenue generated by month from the Company's standpipe. Further, RUCO recommends that if the Company is over-earning it be addressed, trued-up, and any excess be refunded to ratepayers in the Company's next rate case.

Rate Case Expense Recovery Surcharge

- Q. Does RUCO believe a rate case expense recovery surcharge is appropriate in this case?
- A. Yes. The Commission awarded the Company rate case expense of \$100,000 total or \$50,000 per division to be amortized over 4 years in Decision No. 70140 (dated January 23, 2008). It is now October 20, 2014, and the Company has over-collected its previously approved rate case expense.

The Commission has been transitioning away from traditional ratemaking in an effort to ameliorate regulatory lag in the utilities favor, and including surcharges and adjuster mechanisms into their decisions. It is only fair that a few of these mechanisms should ameliorate the effects of regulatory lag in favor of the ratepayers. And really, in this instance it is only fair and makes sense that the ratepayers should only have to pay the authorized amount of rate case expense.

RUCO's recommendation here is to assure that the ratepayers only pay for the amount of rate case expense authorized – no more and no less. There is no reason why the Company should continue to over-collect rate case expense. Moreover, the Commission has already approved the same rate case expense surcharge in Decision No. 73573.⁵

⁵ Pima Utility Company, Docket No. W-02199A-11-0329 ET AL.

Q. What is RUCO's recommendation?

- A. RUCO, consistent with the language in Decision No. 73573, recommends that the Commission implement a rate case surcharge of \$4.276 per customer for the Water Division and a rate case surcharge of \$4.25 for the Wastewater Division with the surcharge remaining in place for either (1) a period of 36 months, or (2) until the Company has collected \$50,000 in rate case expense recovery from both Divisions, whichever comes first.
- Q. Should there be a provision in this case to prevent the Company from circumventing the system, by filing a rate case earlier than 36 months and asking for recovery of prior authorized rate case expense that have not been recovered through the surcharge?
- A. Yes. The Company anticipated that it would file another rate case in five years. RUCO is not suggesting that the Company would deliberately file another rate case in 24 months in order to over-collect rate case expense, however, a provision should be in place that prevents the Company from over-earning its rate case expense.

Alternative Rate Design

- Q. You mentioned in your direct testimony on page 16, that RUCO might offer an alternative rate design to help mitigate rate shock?
- A. Yes. RUCO has looked into a three year phase-in of rates for both the water and wastewater divisions.

⁶ Water Division - \$50,000 rate case expense / 325 customers / 36 months. Wastewater Division - \$50,000 rate case expense / 327 customers / 36 months.

Q. Why are phase-in rates problematic?

- A. From the Company's perspective, a Commission directive requiring a phase-in could be considered confiscatory depending how it is set-up. From RUCO's perspective, RUCO would not recommend a phase-in because it ends up costing the ratepayer more in the long-run, unless the Company is willing to forgo the carrying costs associated with a phase-in.
- Q. Does your silence on any of the issues, matters or findings addressed in the testimony of any of the witnesses for the Company constitute your acceptance of their positions on such issues, matters or findings?
- A. No. RUCO limited its discussion to the specific issues outlined above.

 RUCO's lack of response to any issue in this proceeding should not be construed as agreement with the Company's position in its rebuttal testimony; rather, where there is no response RUCO relies on its original direct testimony.
- Q. Does this conclude your surrebuttal testimony?
- 19 A. Yes.

Surrebuttal Schedules of Jeffrey M. Michlik

TABLE OF CONTENTS TO SCHEDULES

SCH#	<u>TITLE</u>
JMM-1	REVENUE REQUIREMENT
JMM-2	RATE BASE - ORIGINAL COSTS
JMM-3	SUMMARY OF ORIGINAL COST RATE BASE ADJUSTMENTS
JMM-4	ORIGINAL COST RATE BASE ADJUSTMENT # 1 - ADJUSTMENT TO ACCUMULATED DEPRECIATION
JMM-5	ORIGINAL COST RATE BASE ADJUSTMENT # 2 - ADJUSTMENT TO ACCUMULATED AMORTIZATION OF CIAC
JMM-6	ORIGINAL COST RATE BASE ADJUSTMENT # 3 - CUSTOMER METER DEPOSITS
JMM-7	OPERATING INCOME STATEMENT - ADJUSTED TEST YEAR AND RUCO RECOMMENDED
JMM-8	SUMMARY OF OPERTING INCOME STATEMENT ADJUSTMENTS - TEST YEAR
JMM-9	OPERATING INCOME ADJUSTMENT # 1 - OTHER OPERATING REVENUE
JMM-10	OPERATING INCOME ADJUSTMENT # 2 - WASTEWATER TESTING EXPENSE
JMM-11	OPERATING INCOME ADJUSTMENT # 3 - RATE CASE EXPENSE
JMM-12	OPERATING INCOME ADJUSTMENT # 4 - MISCELLANEOUS EXPENSE
JMM-13	OPERATING INCOME ADJUSTMENT # 5 - DEPRECIATION EXPENSE
JMM-14	OPERATING INCOME ADJUSTMENT # 6 - PROPERTY TAX
JMM-15	OPERATING INCOME ADJUSTMENT # 7 - INCOME TAX
JMM-16	RATE DESIGN
JMM-17	TYPICAL BILL

REVENUE REQUIREMENT

LINE <u>NO.</u>	<u>DESCRIPTION</u>	(A) COMPANY FAIR <u>VALUE</u>			(B) RUCO FAIR <u>VALUE</u>
1	Adjusted Rate Base	\$	1,566,542	\$	1,575,194
2	Adjusted Operating Income (Loss)	\$	(8,265)	\$	11,103
3	Current Rate of Return (L2 / L1)		-0.53%		0.70%
4	Required Rate of Return		11.00%		9.25%
5	Required Operating Income (L4 * L1)	\$	172,320	\$	145,705
6	Operating Income Deficiency (L5 - L2)	\$	180,584	\$	134,603
7	Gross Revenue Conversion Factor		1.2650		1.0111 *
8	Required Revenue Increase (L7 * L6)	\$	228,447	\$	136,091
9	Adjusted Test Year Revenue	\$	208,004	\$.	206,184
10	Proposed Annual Revenue (L8 + L9)	\$.	436,451	\$	342,275
11	Required Increase in Revenue (%)		109.83%		66.00%

References:

Column (A): Company Schedule A-1

Column (B): RUCO Schedules JMM-2 and JMM-7

^{*} RUCO includes a property tax revenue conversion factor

RATE BASE - ORIGINAL COST

LINE NO.		C	(A) COMPANY AS <u>FILED</u>	(B) RUCO <u>STMENTS</u>	<u>A</u>	(C) RUCO AS <u>DJUSTED</u>
1	Plant in Service	\$	2,496,640	\$ -	\$	2,496,640
2	Less: Accumulated Depreciation		726,406	(9,919)		716,487
3	Net Plant in Service	\$	1,770,234	\$ 9,919	\$	1,780,153
4				 	S	
5	<u>LESS:</u>					
6						
7	Contributions in Aid of Construction (CIAC)	\$	294,745	\$ -	\$	294,745
8	Less: Accumulated Amortization		96,938	(1,267)	\$	95,671
9	Net CIAC		197,807	1,267	\$	199,074
10						
11	Advances in Aid of Construction (AIAC)		-	-		-
12						
13	Customer Meter Deposits		5,885	-		5,885
14	Customer Deposits		-	-		-
15	Deferred Income Taxes & Credits		-	-		-
17	FHSD Settlement		-			-
18						
19	ADD:					
20						
21						
22	Deferred Debits		-	-		-
23						
24	Working Capital Allowance		-	-		-
25						
26				 		
27	Original Cost Rate Base	<u>\$</u>	1,566,542	\$ 8,652	<u>\$</u>	1,575,194

References:

Column [A]: Company as Filed
Column [B]: Schedule JMM-3
Column (C): Column (A) + Column (B)

SUMMARY OF ORIGINAL COST RATE BASE ADJUSTMENTS

LINE NO.	E ACCT		[A]		[B]		[C]	[D]		[D]
	NT IN SE			Adju	ADJ #1 ustment to		ADJ #2 Adjustment to	<u>ADJ #3</u> Not		
	VI IIV OL		COMPANY		ted Depreciaion	Acc	cumulated Amortization of CIAC	Used		RUCO
1	301	<u>DESCRIPTION</u> Organization Cost	AS FILED		Sch JMM-4		Ref: Sch JMM-5	Ref: Sch JMM	6	ADJUSTED
2	302		\$	\$	-	\$		\$		\$ -
3	303		.		-				_	Ψ -
4	304	Structures and Improvements	210,000		-				_	210,000
5	305		72,997		-				_	
6	306	Collecting and Impounding Res.	-		-		· _		-	72,997
7	307	Lake River and Other Intakes	-		-				-	
8	308	Wells and Springs	1,353,539		-				•	4 050 500
9	309	Infiltration Galleries and Tunnels							-	1,353,539
10		Supply Mains			-				-	. •
	310	Power Generation Equipment	. 89,125		_		· · · · · · · · · · · · · · · · · · ·		•	· ·
11	311	Electric Pumping Equipment	158,711		_				-	89,125
12	320.0		5,487		-		· · · · · · · · · · · · · · · ·		-	158,711
13	320.1	· · · · · · · · · · · · · · · · · · ·	-		_		-		-	5,487
14	320.2		-		· · · · ·		· · · •		-	-
15	330	Dist. Reservoirs & Standpipe	321,452				· •		-	. •
16	330.1		´ <u>-</u>				· · · · · · · · · · · · · · · ·		-	321,452
17	330.2		-				· · · · · · · · · · · · · · · · · · ·		-	•
18	331	Trans. and Dist. Mains	161.632				. -			-
19	333	Services	86,250						-	161,632
20	334	Meters	-		-		- : -		-	86,250
21	335	Hydrants	34,500		-				-	
22	336.0	Backflow Prevention Devices			-		. •		-	34,500
23	339	Other Plant and Misc. Equip.	_							
24	340	Office Furniture and Fixtures	2,947		-		· · · · · · · · · · · · · · · ·		-	-
25	340	Computers and Software	2,547		-		-		-	2,947
26	341	Transportation Equipment	· .		-		•		-	-
27	342	Stores Equipment	-		-		, -		-	· .
28	343	Tools and Work Equipment	-		-				-	_
29	344	Laboratory Equipment					.		-	
30	345	Power Operated Equipment	•		-				-	_
31	346	Communications Equipment	-		-					
32	347	Miscellaneous Equipment	-		-					_
33	348	Other Tangible Plant			-					_
51	Total Pla	ant in Service	\$ 2,496,640			<u> </u>			-	
		ccumulated Depreciation	2,700,070	\$		\$	-	\$	- \$	2,496,640
53			726,406		(9,919)		=		- *	716,487
54	Net Plan	it in Service	¢ 4.770.004		-				_	. 10,407
55			\$ 1,770,234	\$	9,919	\$		\$	- \$	1,780,153
	LESS:									1,700,100
		tions in Aid of Construction (CIAC)		_						
58	Less: A	Accumulated Amortization	\$ 294,745	\$	-	\$	-	\$	- \$	294,745
59		CIAC (L25 - L26)	96,938		-		(1,267)		- \$	95.671
		s in Aid of Construction (AIAC)	197,807		-		1,267		. *	199,074
	Custome	er. Deposits			-				_	199,074
62	o do to i i i c	. Doposits	5,885		-		<u>-</u>			5,885
63					-					5,885
64			.=		-		<u>-</u>			-
66	ADD:		-		.		_			-
	Deferred	Dobite	-		-					· · · · · · · · · · · · · · · · · · ·
		Capital Allowance	-		-			,		
69	· · or kii ig	Odpital Allowance	-		. -		· · · · · · · · · · · · · · ·			•
	Original	Cost Rate Base						•		· · · · ·
,	ig.iiai	COSt Mate Dase	\$ 1,566,542	\$	9,919	\$	(1,267)	\$	\$	1,575,194
									<u> </u>	1,575, 194

RATE BASE ADJUSTMENT NO. 1 - ADJUSTMENT TO ACCUMULATED DEPRECIATION

			[A]		[B]	_ [C]
LINE	ACCT		COMPA	NY	RUCO	RUCO
NO.	NO.	DESCRIPTION	PROPOS	SED	ADJUSTMENTS	RECOMMENDED
1		Accumulated Depreciation	\$	726,406	\$ (9,919)	\$ 716,487

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

RATE BASE ADJUSTMENT NO. 2 - ADJUSTMENT TO ACCUMULATED AMORTIZATION OF CIAC

				[A]		[B]		[C]
LINE	ACCT		T	COMPANY	R	UCO		RUCO
NO.	NO.	DESCRIPTION		PROPOSED	ADJUS	STMENTS	RECO	DMMENDED
1		Accumulated Amortization of CIAC	\$	96,938	\$	(1,267)	\$	95,671

REFERENCES:

RATE BASE ADJUSTMENT NO. 3 - NOT USED

			[A]	[B]	[C]
LINE	ACCT		COMPANY	RUCO	RUCO
NO.	NO.	DESCRIPTION	PROPOSED	ADJUSTMENTS	RECOMMENDED
1			_\$	- \$ -	\$ -

REFERENCES:

OPERATING INCOME STATEMENT - ADJUSTED TEST YEAR AND RUCO RECOMMENDED

LINE NO.	<u>DESCRIPTION</u>	A TI	[A] COMPANY DJUSTED EST YEAR AS FILED		[B] RUCO EST YEAR USTMENTS		[C] RUCO EST YEAR AS DJUSTED		[D] RUCO ROPOSED HANGES	REC	[E] RUCO OMMENDED
1	REVENUES:										
2 3	Metered Water Sales	\$	202,743	\$	-	\$	202,743	\$	136.091	•	
4	Water Sales-Unmetered		-		-	•	-	Ψ	150,051	\$	338,834
5	Other Operating Revenue Intentionally Left Blank		5,261		(1,820)		3,441		_		2 444
6	Total Operating Revenues						-,		_		3,441
7	rotal Operating Revenues	\$	208,004	\$	(1,820)	\$	206,184	\$	136,091	\$	342,275
8	OPERATING EXPENSES:						,	•	700,001	Ψ	342,275
9	Salaries and Wages										
10	Purchased Water	\$	=	\$	_	\$	-	\$	_	\$	
11	Purchased Power				-		-		-	*	-
12	Fuel For Power Production		66,787		-		66,787		_		66,787
13	Chemicals		- · · · · ·		-		-		-		00,707
14	Materials and Supplies		1,460		-		1,460		_		1.460
15	Office Supplies and Expense		12,257		-		12,257		-		12,257
16	Contractual Services - Accounting		2,399		-		2,399		_		2,399
17	Contractual Services - Professional		20,253		-		20,253		_		20,253
18	Contractual Services - Maintenance		9,651		-		9,651		-		9,651
19	Contractual Services - Other		-		-		_		_		3,031
20	Water Testing				-		-		_		-
21	Rents		8,107		(7,733)		374		_		374
22	Transportation Expenses		-		-		-		-		374
23	Insurance - General Liability		<u>-</u>		•		-		_		•
24	Insurance - Health and Life		2,186		-		2,186		-		2,186
25	Reg. Comm. Exp Other		-		-		-		_		2,100
26	Reg. Comm. Exp Rate Case		-		-		-		-		
27	Miscellaneous Expense		10,000		(10,000)		_		-		-
28	Bad Debt Expense		19,976		(4,116)		15,860		_		15.860
29	Depreciation and Amortization Expense				-		-		_		15,000
30	Taxes Other Than Income		57,728		(637)		57,091		-		57,091
31	Property Taxes				-		-		_		-
32	Income Tax		7,530		(766)		6,764		1,488		8,253
33	Interest on Customer Deposits		(2,064)		2,064		(0)		-		(0)
34	Total Operating Expenses		-						_		(0)
35	Operating Income (Loss)	<u> </u>	216,269	_\$	(21,188)	\$	195,081	\$	1,488	\$	196,569
	()	<u> </u>	(8,265)	\$	19,368	\$	11,103	\$	134,603	\$	145,705
	References										10,7,00

References:
Column (A): Company Schedule C-1
Column (B): Schedule JMM-8
Column (C): Column (A) + Column (B)
Column (D): Schedule JMM-14
Column (E): Column (C) + Column (D)

Utility Source, LLC - Water Division Docket No. WS-04235A-13-0331 Test Year Ended: December 31, 2012

SUMMARY OF OPERATING INCOME STATEMENT ADJUSTMENTS - TEST YEAR

NOTEGIBLOSSIC										:
•		COMPANY AS FILED	Other Operating Revenues ADJ #1	Water Testing Expense	Rate Case Expense	Miscellaneous Expense	Depreciation Expense	Property Tax Expense	Income Tax Expense	SISO
KEVENUES: Metered Water Sales	ь	202 743	Ref: Sch JMM-9	M-10	ef: Sch JMM-11	Ref: Sch JMM-12	Ref: Sch JMM-13	ADJ #6 Ref: Sch JMM-14	ADJ#7 Ref: Sch IMM-15	ADJUSTED
Water Sales-Unmetered	•	2	<i>•</i>			e9-				\$ 202 743
Other Operating Revenue Intentionally Left Blank		5,261	(1,820)		1 1	1)	, ,		r	
Total Operating Revenues	\$	208,004 \$	(1,820) \$					•	' '	3,44
OPERATING EXPENSES:				•	•		•	,	· •	\$ 206,184
Salaries and Wages	€9	•	6 7	,						
Furchased Water Purchased Dower		, ;	•	→		6 9	·	'	· \$	· •
Fuel For Power Production		66,787	•	,	1	. ,		•	•	•
Chemicals		1 460	•	•	,	•			•	66,787
Materials and Supplies		12.257	ŀ	•		•	,	•	•	
Office Supplies and Expense		2,399	• :	•		•	•	,	, ,	1,46
Contractual Services - Accounting		20,253		•		•	•	•	•	2,23
Contractual Services - Professional		9,651	,		• •	•	•		•	20.25
Contractual Services - Maintenance Contractual Services - Other			•	1				•	•	9,651
Water Testing		0 407	,	•	•	•			•	•
Rents		0,107	,	(7,733)				•	•	•
Fransportation Expenses				•	•	•	•		•	37,
insurance - General Liability		2.186	•		•	•	•	•		•
nsurance - Health and Life				•	,	•	,	,	•	2 186
Reg. Comm. Exp Other		•	•	. ,		•	,		,	, ,
reg. Comm. Exp Rate Case Miscellaneous Evance		10,000	•		(10,000)	•		,	•	•
Rad Debt Expense		19,976	•	•	(000,01)	. 118)	•		•	•
Depreciation and Amortization Exposes		. ;	•	•		(o11,+)	•	•	•	15,860
Taxes Other Than Income		57,728	ı	•	•	•	í c	•	•	•
Property Taxes		, ;	ī		•	• •	(159)		•	57,091
ncome Tax		056,7	•	•	,	•		(992)	•	•
nterest on Customer Deposits		(2,004)	1	•	,	•		(00/)	, 00	6,764
Total Operating Expenses	ss	216,269 \$, ,	- 1	- 1		,		4,064	(0)
Operating Income (Loss)	မာ	1 1	(1,820) \$	7 733 \$	(10,000) \$		\$ (22)	\$ (992)	2,064	\$ 195,080
				11	П	4,116 \$	637 \$	992	\$ (2,064)	

OPERATING INCOME ADJUSTMENT NO. 1 - OTHER OPERATING REVENUE

			[A]		[B]	[C]
LINE		CON	IPANY	F	RUCO	RUCO
NO.	DESCRIPTION	PRO	POSED	ADJU	STMENTS	RECOMMENDED
1	Other Operating Revenue	\$	5,261	\$	(1,820)	\$ 3,441

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 2 - WATER TESTING EXPENSE

			[A]	[3]	[C]
LINE		COM	PANY	RU	CO	RUCO
NO.	DESCRIPTION	PRO	POSED	ADJUS	TMENTS	RECOMMENDED
1	Water Testing Expense	\$	8,107	\$	(7,733)	\$ 374

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 3 - RATE CASE EXPENSE

			[A]		[B]		[C]
LINE		CO	MPANY	F	RUCO		RUCO
NO.	DESCRIPTION	PRO	OPOSED	ADJU	STMENTS	F	RECOMMENDED
1	Rate Case Expense	\$	10,000	\$	(10,000)	\$	-

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 4 - MISCELLANEOUS EXPENSE

			[A]		[B]	[C]
LINE NO.	DESCRIPTION		MPANY OPOSED	1	UCO STMENTS	 NUCO MMENDED
1	Miscellaneous Expense	\$	19,976	\$	(4,116)	\$ 15,860
2				<u></u>		
3	Automobile Expense	\$	1,750			
4	Telephone Expense	\$.	2,366			
5		\$	4,116	•		

REFERENCES:

OPERATING INCOME ADJUSTMENT NO. 5 - DEPRECIATION EXPENSE ON TEST YEAR PLANT

			[A]	_[B]	[C]	[O]	[E]
			PLANT In	NonDepreciable	DEPRECIABLE		DEPRECIATION
	ACCT		SERVICE	or Fully Depreciated	PLANT	DEPRECIATION	EXPENSE
NO.		DESCRIPTION	Per RUCO	PLANT	(Col A - Col B)	RATE	(Col C x Col D)
1	301	Organization Cost	\$ - 5		\$ -	0.00%	
2		Franchise Cost	\$ - 3		\$ -	0.00%	
3	303	Land and Land Rights	\$ 210,000		\$	0.00%	
4	304	Structures and Improvements	\$ 72,997		\$ 72,997	3.33%	
5	305	Collecting and Impounding Res.		-	\$	2.50%	
6	306	Lake River and Other Intakes	\$ - 3		\$ -	2.50%	
7	307	Wells and Springs	\$ 1,353,539		\$ 1,353,539	3.33%	
8	308	Infiltration Galleries and Tunnels	\$ - 5	,	\$ -	6.67%	
9	309	Supply Mains	\$		\$	2.00%	•
10		Power Generation Equipment	\$89,125		\$ 89,125	5.00%	
11	311	Electric Pumping Equipment	\$ 158,711		\$. <u>-</u>	12.50%	
12		Water Treatment Equipment	\$ 5,487		\$ 5,487	3.33%	
13		Water Treatment Plant	\$ 8		\$ -	3.33%	
14		Chemical Solution Feeders	\$ - 8		\$	20.00%	•
15		Dist. Reservoirs & Standpipe	\$ 321,452		\$ 321,452	2.22%	
16		Storage tanks	\$ \$	· ·	\$	2.22%	
17		Pressure Tanks	\$ \$		\$ -	5.00%	5
18		Trans. and Dist. Mains	\$ 161,632	•	\$ 161,632	2.00%	
19	333	Services	\$ 86,250	i	\$ 86,250	3.33%	2,872
20	334	Meters	\$ - \$		\$	8.33%	
21	335	Hydrants	\$ 34,500 \$	-	\$ 34,500	2.00%	690
22	336.0	Backflow Prevention Devices	\$ - \$.	\$ -	6.67%	-
23	339	Other Plant and Misc. Equip.	\$ - \$	• · · · · · · · · · · · · · · · · · · ·	\$ -	6.67%	
24	340	Office Furniture and Fixtures	\$ 2,947 \$		\$ 2,947	6.67%	197
25	340	Computers and Software	\$ - \$		\$ -	20.00%	
26	341	Transportation Equipment	\$ - \$	-	\$ -	20.00%	-
27	342	Stores Equipment	\$ - \$		\$ -	4.00%	
28	343	Tools and Work Equipment	\$ 9	-	\$ -	5.00%	
29	344	Laboratory Equipment	\$ - 5	-	\$ -	10.00%	
30	345	Power Operated Equipment	\$ - \$	_	s -	5.00%	
31	346	Communications Equipment	\$ - \$	-	\$ -	10.00%	
32	347	Miscellaneous Equipment	\$ - \$	-	\$ -	10.00%	
33	348	Other Tangible Plant	\$ \$		\$ -	10.00%	
34		Total Plant	\$ 2,496,640 \$	368,711	\$ 2,127,929		
35				•			
36		Composite Depreciation Rate:					3.11%
37		Contributions in Aid of Construction ("CIAC"):				9	
38		Amortization of CIAC:					9,179
39						`	. 0,175
40		Depreciation Expense before Amortization of CIAC:				\$	66,270
41		Less Amortization of CIAC:				9	9,179
42		Test Year Depreciation Expense - RUCO				-3	57,091
43		*				`	
44		Depreciation Expense - Company				9	57,728
45		• • •					7.1720
46		RUCO's Adjustment to Depreciation Expense				_3	(637)

References:
Column [A]: Schedule JMM-3
Column [B]: From Column [A]
Column [C]: Column [A] - Column [B]
Column [D]: Company Engineering Depreciation Rates
Column [E]: Column [C] x Column [D]

OPERATING INCOME ADJUSTMENT NO. 6 - PROPERTY TAX EXPENSE

			[A]		[B]
LINE		_	RUCO		RUCO
NO	Property Tax Calculation	AS A	ADJUSTED	REC	OMMENDED
		_		_	
1	RUCO Adjusted Test Year Revenues	\$	206,184	\$	206,184
2	Weight Factor		2		2
3	Subtotal (Line 1 * Line 2)		412,368	\$	412,368
4	RUCO Recommended Revenue, Per Schedule JMM-1		206,184	\$	342,275
5	Subtotal (Line 4 + Line 5)		618,552		754,643
6	Number of Years		3		3
7	Three Year Average (Line 5 / Line 6)		206,184	\$	251,548
8	Department of Revenue Mutilplier		2		2
9	Revenue Base Value (Line 7 * Line 8)		412,368	\$	503,096
10	Plus: 10% of CWIP -		-		-
11	Less: Net Book Value of Licensed Vehicles		-	\$	-
12	Full Cash Value (Line 9 + Line 10 - Line 11)		412,368	\$	503,096
13	Assessment Ratio		18.125%	•	18.125%
14	Assessment Value (Line 12 * Line 13)		74,742	\$	91,186
15	Composite Property Tax Rate (Per Company Schedule)		9.0503%		9.0503%
16					
17	RUCO Test Year Adjusted Property Tax (Line 14 * Line 15)	\$	6,764		
18	Company Proposed Property Tax	·	7,530		
19	1. 2. 1 1. 2				
20	RUCO Test Year Adjustment (Line 16-Line 17)	\$	(766)		
21		=-	(, , , ,		
22	Property Tax - RUCO Recommended Revenue (Line 14 Line 15)			\$	8,253
23	RUCO Test Year Adjusted Property Tax Expense (Line 17)			\$	6,764
24	Increase in Property Tax Expense Due to Increase in Revenue Requirement			\$	1,488
25					
26	Increase to Property Tax Expense			\$	1,488
27	Increase in Revenue Requirement			*	136.091
28	Increase to Property Tax per Dollar Increase in Revenue (Line 26/Line 27)				1.093577%
29	tate to the por police into occome the control of				00007770
30	Property Tax Conversion Factor = 1 / (101093577)				1.0111

OPERATING INCOME ADJUSTMENT NO. 7 - INCOME TAX EXPENSE

		[A]	[B]	[C]
LINE		COMPANY	RUCO	RUCO
NO.	DESCRIPTION	PROPOSED	ADJUSTMENTS	RECOMMENDED
1	Income Tax Expense	\$ (2,064)	\$ 2,064	\$ (0)

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

thly Usage Charge	Present	Company Proposed Rates	RUCO
	Tresent	Proposed Rates	Recommended Rates
Meter Size (All Classes):			
5/8x3/4 Inch	\$ 18.50	\$ 41.07	\$ 29.0
3/4 Inch	18.50	41.07	29.0
1 Inch	46.50	102.68	72.5
1 1/2 Inch	92.50	205.35	145.0
2 Inch	148.00	328.56	
3 Inch	296.00	657.12	232.0
4 Inch	462.50		464.
6 Inch	925.00	1,026.75	725.
8 Inch	l l	2,053.50	1,450.
10 Inch	N/A	N/A	2,320.
12 Inch	N/A N/A	N/A N/A	3,335. 6,235.
modity Charge - Per 1,000 Gallons			
5/8x3/4 and 3/4" Meter (Residential)			
First 4,000 gallons	\$ 4.80	¢ 0.05	_
4,001 to 9,000 gallons		\$ 8.25	\$ 7.1
Over 9,000 gallons	7.16	15.75	13.4
-	8.60	21.75	17
5/8x3/4 and 3/4" Meter (Commercial)			
First 4,000 gallons	4.80	N/A	N
4,001 to 9,000 gallons	7.16	N/A	N N
Over 9,000 gallons	8.60	N/A	N N
First 9,000 gallons	N/A		
Over 9,000 gallons	N/A N/A	15.75 21.75	13.0 17.
1" Meter (Residential, Commercial)			
First 27,000 gallons	4.80	A1/A	
Over 27,000 gallons	7.16	N/A N/A	N, N
First 18,000 gallons	N/A	N/A	13.0
Over 18,000 gallons	N/A	N/A	17.4
1.5" Meter (Residential, Commercial)			
First 57,000 gallons	4.80	15.75	
Over 57,000 gallons	7.16	21.75	N, N
First 33,000 gallons	N/A	N/A	13.0
Over 33,000 gallons	N/A	N/A	17.4
2" Meter (Residential, Commercial) First 94,000 gallons			
	4.80	15.75	N/
Over 94,000 gallons	7.16	21.75	N/
First 52,000 gallons	N/A	N/A	12.0
Over 52,000 gallons	N/A	N/A	13.0 17.4
3" Meter (Residential, Commercial)			
First 195,000 gallons	4.80	15.75	N/
Over 195,000 gallons	7.16	21.75	N/
First 104,000 gallons	N/A	N/A	13.0
Over 104,000 gallons	N/A	N/A	17.4
4" Meter (Residential, Commercial)			
First 309,000 gallons	4.80	15.75	N/A
Over 309,000 gallons	7.16	21.75	N/A
First 160,000 gallons	N/A	N/A	13.0
Over 160,000 gallons	N/A	N/A	17.4

Rate Design

6" Meter (Residential, Commercial)			
First 615,000 gallons	4.80	15.75	
Over 615,000 gallons	7.16	21.75	N/A
F1 + 00 F 00 F 11		21.75	N/A
First 325,000 gallons	N/A	N/A	12.00
Over 325,000 gallons	N/A	N/A	13.08 17.40
8" Meter (Residential, Commercial)			17.40
First 524,000 gallons			
Over 524,000 gallons	N/A	N/A	13.08
Troit of the second	N/A	N/A	17.40
10" Meter (Residential, Commercial)			
First 750,000 gallons	N/A		
Over 750,000 gallons	N/A	N/A	13.08
	N/A	N/A	17.40
12" Meter (Residential, Commercial)			
First 1,400,000 gallons	N/A	N/A	42.00
Over 1,400,000 gallons	N/A	N/A	13.08 17.40
<u>Irrigation</u>			17.40
All Usage			
7 050g0	9.26	21.75	17.40
Bulk/Construction	İ		
All Usage	10.35	04.75	
	.5.55	21.75	17.40
	1	•	

Typical Bill Analysis General Service 3/4-Inch Meter

Company Proposed	Gallons	 Present Rates	oposed Rates	 Dollar Increase	Percent Increase
Average Usage	4,123	\$ 38.58	\$ 76.00	\$ 37.42	97.01%
Median Usage	3,500	35.30	69.95	\$ 34.65	98.14%
RUCO Recommended			 	 	
Average Usage	4,123	\$ 38.58	\$ 59.01	\$ 20.43	52.95%
Median Usage	3,500	35.30	53.85	\$ 18.55	52.55%

Present & Proposed Rates (Without Taxes) General Service 3/4-Inch Meter

		Company			RUCO	
Gallons	Present	Proposed	%	F	Recommended	%
Consumption	 Rates	Rates	Increase		Rates	Increase
-	\$ 18.50	\$ 41.07	122.00%	\$	29.00	56.76%
1,000	\$ 23.30	\$ 49.32	111.67%	\$	36.10	54.94%
2,000	\$ 28.10	\$ 57.57	104.88%	\$	43.20	53.74%
3,000	\$ 32.90	\$ 65.82	100.06%	\$	50.30	52.89%
4,000	\$ 37.70	\$ 74.07	96.47%	\$	57.40	52.25%
5,000	\$ 44.86	\$ 89.82	100.22%	\$	70.48	57.11%
6,000	\$ 52.02	\$ 105.57	102.94%	\$	83.56	60.63%
7,000	\$ 59.18	\$ 121.32	105.00%	\$	96.64	63.30%
8,000	\$ 66.34	\$ 137.07	106.62%	\$	109.72	65.39%
9,000	\$ 73.50	\$ 152.82	107.92%	\$	122.80	67.07%
10,000	\$ 82.10	\$ 174.57	112.63%	\$	140.20	70.77%
11,000	\$ 90.70	\$ 196.32	116.45%	\$	157.60	73.76%
12,000	\$ 99.30	\$ 218.07	119.61%	\$	175.00	76.23%
13,000	\$ 107.90	\$ 239.82	122.26%	\$	192.40	78.31%
14,000	\$ 116.50	\$ 261.57	124.52%	\$	209.80	80.09%
15,000	\$ 125.10	\$ 283.32	126.47%	\$	227.20	81.61%
16,000	\$ 133.70	\$ 305.07	128.18%	\$	244.60	82.95%
17,000	\$ 142.30	\$ 326.82	129.67%	\$	262.00	84.12%
18,000	\$ 150.90	\$ 348.57	130.99%	\$	279.40	85.16%
19,000	\$ 159.50	\$ 370.32	132.18%	\$	296.80	86.08%
20,000	\$ 168.10	\$ 392.07	133.24%	\$	314.20	86.91%
25,000	\$ 211.10	\$ 500.82	137.24%	\$	401.20	90.05%
30,000	\$ 254.10	\$ 609.57	139.89%	\$	488.20	92.13%
35,000	\$ 297.10	\$ 718.32	141.78%	\$	575.20	93.60%
40,000	\$ 340.10	\$ 827.07	143.18%	\$	662.20	94.71%
45,000	\$ 383.10	\$ 935.82	144.28%	\$	749.20	95.56%
50,000	\$ 426.10	\$ 1,044.57	145.15%	\$	836.20	96.25%
75,000	\$ 641.10	\$ 1,588.32	147.75%	\$	1,271.20	98.28%
100,000	\$ 856.10	\$ 2,132.07	149.04%	\$	1,706.20	99.30%

Utility Source, L.L.C. - Wastewater Division Docket No. WS-04235A-13-0331

Test Year Ended: December 31, 2012

Surrebuttal Schedules of Jeffrey M. Michlik

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JMM-7	OPERATING INCOME STATEMENT - ADJUSTED TEST YEAR AND RUCO RECOMMENDED
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JMM-15	OPERATING INCOME ADJUSTMENT # 7 - INCOME TAX
JMM-16	RATE DESIGN
JMM-17	TYPICAL BILL

Utility Source, L.L.C. - Wastewater Division Docket No. WS-04235A-13-0331

Test Year Ended: December 31, 2012

REVENUE REQUIREMENT

		C	(A) YNAPMC		(B) RUCO	
LINE <u>NO.</u>	DESCRIPTION		FAIR VALUE	FAIR <u>VALUE</u>		
1	Adjusted Rate Base	\$	830,945	\$	825,856	
2	Adjusted Operating Income (Loss)	\$	(72,257)	\$	(81,884)	
3	Current Rate of Return (L2 / L1)		-8.70%		-9.92%	
4	Required Rate of Return		11.00%		9.25%	
5	Required Operating Income (L4 * L1)	\$	91,404	\$	76,392	
6	Operating Income Deficiency (L5 - L2)	\$	163,661	\$	158,276	
7	Gross Revenue Conversion Factor		1.2022		1.0113 *	
8	Required Revenue Increase (L7 * L6)	\$	196,760	\$	160,060	
9	Adjusted Test Year Revenue	\$	121,284	\$	119,464	
10	Proposed Annual Revenue (L8 + L9)	\$	318,044	\$	279,524	
11	Required Increase in Revenue (%)		162.23%		133.98%	

References:

Column (A): Company Schedule A-1

Column (B): RUCO Schedules JMM-2 and JMM-7

^{*} RUCO includes a property tax revenue conversion factor

Utility Source, L.L.C. - Wastewater Division Docket No. WS-04235A-13-0331

Test Year Ended: December 31, 2012

RATE BASE - ORIGINAL COST

LINE <u>NO.</u>		C	(A) COMPANY AS <u>FILED</u>	R	(B) UCO STMENTS	<u>A</u>	(C) RUCO AS DJUSTED
1	Plant in Service	\$	1,397,271	\$	•	\$	1,397,271
2	Less: Accumulated Depreciation		455,064		28	·	455,092
3	Net Plant in Service	\$	942,206	\$	(28)	\$	942,179
4							
5	LESS:						
6							
7	Contributions in Aid of Construction (CIAC)	\$	197,973	\$	-	\$	197,973
8	Less: Accumulated Amortization		86,711		44	_\$	86,715
9	Net CIAC		111,262		(4)	\$	111,258
10	Advances 1: A11 (O) () (A14 O)						
11 12	Advances in Aid of Construction (AIAC)		-		-		-
13	Customer Meter Deposits						
14	Customer Deposits		-		- E 06E		-
15	Deferred Income Taxes & Credits		-		5,065		5,065
17	Deferred meetine Taxes & Oregits		_		<u>-</u>		-
18			_		_		-
19	ADD:						
20							
21							
22	Deferred Debits		-		-		-
23							
24	Working Capital Allowance		-		-		-
25							
26							
27	Original Cost Rate Base	\$	830,945	\$	(5,089)	\$	825,856

References:

Column [A]: Company as Filed Column [B]: Schedule JMM-3

Column (C): Column (A) + Column (B)

Schedule JMM-2

SUMMARY OF ORIGINAL COST RATE BASE ADJUSTMENTS

			[A]	[B]	[C]	[D]	[E]
	ACCT.			AD 1 #4	ADJ #2	AD 1 #2	
<u>NO.</u>	NO.			ADJ #1 Adjustment to	Adjustment to	ADJ #3 Customer	
PLAN	VT IN SEI	RVICE:	COMPANY	Accumulated Deprecation	Accumulated Amortization of CIAC	Deposits	RUCO
1	** #** QEE	DESCRIPTION	AS FILED	Ref: Sch JMM-4	Ref: Sch JMM-5	Ref: Sch JMM-6	ADJUSTED
2	351	Organization Cost	\$	\$ -	\$ -	\$ -	\$ -
3	352	Franchise Cost	-	-	-	-	-
4	353	Land and Land Rights	105,000	-	-	-	105,000
5	354	Structures & Improvements	56,350	-	-	-	56,350
6	355	Power Generation Equipment	2,879	-	-	-	2,879
7 8	360 361	Collection Sewers - Force Collection Sewers - Gravity	260,553	-	-	-	260,553
9	361	Special Collecting Structures	200,003	-	<u>.</u>	-	260,555
10	362	Servcies to Customers	60,375	-	-	-	60,375
11	364	Flow Measuring Devices	00,870	_	<u>-</u>	-	-
12	365	Flow Measuring Installations	-	-	-	_	-
13	366	Reuse Services	3,450	-	-		3,450
14	367	Reuse Meters and Meter Installations	-	-	-	-	
15	370	Receiving Wells	-	-	-	-	-
16	371	Pumping Equipment	-	-	-	-	-
17	374	Reuse Distribution Reserviors	-	-	-	-	-
18	375	Reuse Transmission and Distribution	-	-	-	-	-
19	380	Treatment & Disposal Equipment	903,992	-	-	-	903,992
20	381	Plant Sewers	-	-	-	-	-
21	382	Outfall Sewer Lines	-	-	-	-	-
22	389	Other Plant & Misc Equipment	-	-	-	-	-
23	390	Office Furniture & Equipment	4,672	-	-	-	4,672
24	390.1		-	-	-	-	-
25 26	391 392	Transportation Equipment	-	-	-	-	-
26 27	392	Stores Equipment Tools, Shop & Garage Equipment	· -	-	-	-	-
28	394	Laboratory Equipment			-	_	_
20	395	Power Operated Equipment	_	<u> </u>	_	-	-
29	396	Communication Equipment	_	_	_	-	-
30	397	Miscellaneous Equipment	-	-	<u>-</u>	-	_
31	398	Other Tangible Plant		-	-	-	-
32	Total PI	ant in Service - Sub Total	1,397,271	-		-	1,397,271
35	Less: A	ccumulated Depreciation	455,064	28	-	-	455,092
36					-	-	
37	Net Pla	nt in Service	\$ 942,207	\$ (28)	\$ -	\$	\$ 942,179
38				·· ·			
39				_		_	
40		utions in Aid of Construction (CIAC)	\$ 197,973	\$ -	\$ -	\$ -	\$ 197,973
41		Accumulated Amortization	86,711		4		\$ 86,715
42 43		CIAC (L25 - L26)	111,262	-	(4)	-	111,258
43		es in Aid of Construction (AIAC) er Meter Deposits	-	-	•	-	-
45		er Deposits	-	-	-	5,065	5,065
46		d Income Taxes & Credits		_	_	5,005	5,005
47	2010116	a moomo raxes a oreale	-		- -	-	- -
48			-	-	-	_	-
49	ADD:		-	-	-	-	-
50		d Debits	-	-	-	-	-
51	Working	g Capital Allowance	•	-	-	-	-
52			-				
53	Origina	I Cost Rate Base	\$ 830,945	\$ (28)	\$ 4	\$ (5,065)	\$ 825,856
							-

RATE BASE ADJUSTMENT NO. 1 - ADJUSTMENT TO ACCUMULATED DEPRECIATION

			 [A]	[B]	[C]
LINE	ACCT		COMPANY	RUCO	RUCO
NO.	NO	DESCRIPTION	PROPOSED	ADJUSTMENTS	RECOMMENDED
1		Accumulated Depreciation	\$ 455,064	\$ 28	\$ 455,092

RATE BASE ADJUSTMENT NO. 2 - ADJUSTMENT TO ACCUMULATED AMORTIZATION OF CIAC

				[A]	[B]	[C]
LINE	ACCT		C	OMPANY	RUCO	RUCO
NO.	NO.	DESCRIPTION	PI	ROPOSED	ADJUSTMENTS	RECOMMENDED
1		Accumulated Amortization of CIAC	\$	86,711	\$ 4	\$ 86,715

RATE BASE ADJUSTMENT NO. 3 - CUSTOMER METER DEPOSITS

				[A]		[B]		[C]
LINE	ACCT		COM	PANY		RUCO		UCO
NO.	NO.	DESCRIPTION	PROI	POSED	AD.	JUSTMENTS	RECO	MENDED
1		Customer Meter Deposits	\$		- \$	5,065	\$	5,065

OPERATING INCOME STATEMENT - ADJUSTED TEST YEAR AND RUCO RECOMMENDED

			[A] OMPANY		[B]		[C] RUCO		[D]		[E]
LINE			DJUSTED ST YEAR		RUCO ST YEAR	16	ST YEAR AS		RUCO OPOSED		RUCO
NO.	DESCRIPTION		S FILED		JSTMENTS	ΑI	DJUSTED		HANGES	REC	OMMENDED
1	REVENUES:										
2	Flat Rate Revenues	\$	_	\$	_	\$	_	\$	_	\$	
3	Measured Water Revenues	•	116,023	*	_	•	116,023	•	160,060	•	276,082
4	Other Operating Revenues		5,261		(1,820)		3,441		-		3,441
5	Intentionally Left Blank		-		-		-		-		-
6	Total Operating Revenues	\$	121,284	\$	(1,820)	\$	119,464	\$	160.060	\$	279,524
7	•				,				,		ŕ
8	OPERATING EXPENSES:										
9	Salaries and Wages	\$	-	\$	-	\$	-	\$	-	\$	-
10	Purchased Water		-		-		_		-		-
11	Purchased Power		26,213		-		26,213		-		26,213
12	Sludge Removal		12,659		-		12,659		-		12,659
13	Chemicals		5,400		_		5,400		-		5,400
14	Materials and Supplies		7,187		-		7,187		-		7,187
15	Office Supplies and Expense		2,446		-		2,446		-		2,446
16	Contractual Services - Accounting		20,135		-		20,135		-		20,135
17	Contractual Services - Professional		1,920		_		1,920		-		1,920
18	Contractual Services - Maintenance		-				-				-
19	Contractual Services - Other		46,650		-		46,650		-		46,650
20	Wastewater Testing		5,669		8,858		14,527		-		14,527
21	Rents		-				-				_
22	Transportation Expenses		3,250				3,250				3,250
23	Insurance - General Liability		2,186		-		2,186		-		2,186
24	Insurance - Health and Life		-		-		-		-		-
25	Reg. Comm. Exp Other		-		-		-		-		-
26	Reg. Comm. Exp Rate Case		10,000		(10,000)		-		-		-
27	Miscellaneous Expense		13,152		(4,116)		9,036		-		9,036
28	Bad Debt Expense		-		-		-		-		-
29	Depreciation and Amortization Expense		45,744		-		45,744		-		45,744
30	Taxes Other Than Income		-		-		-		-		-
31	Property Taxes		4,476		(480)		3,995		1,784		5,780
32	Income Tax		(13,545)		13,545		0		-		0
33	Interest on Customer Deposits		-		0		0		-		0
34											
35	Total Operating Expenses	\$	193,541	\$	7,807	\$	201,348	\$	1,784	\$	203,132
36	Operating Income (Loss)	\$	(72,257)	\$	(9,627)	\$	(81,884)	\$	158,276	\$	76,392

References:
Column (A): Company Schedule C-1
Column (B): Schedule JMM-8
Column (C): Column (A) + Column (B)
Column (D): Schedule JMM-14
Column (E): Column (C) + Column (D)

Utility Source, L.L.C. - Wastewater Division Docket No. WS-04235A-13-0331 Test Year Ended: December 31, 2012

SUMMARY OF OPERATING INCOME STATEMENT ADJUSTMENTS - TEST YEAR

		N 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1							
	[A]	[8]	[O]	[0]	Ξ	E	5	Ξ	E
NO.	COMPANY	Other Operating Revenues	Water Testing Expense	Rate Case	Miscellaneous		Property Tax	Income	=
1 REVENUES:	AS FILED	ADJ #1 Ref: Sch JMM-9	ADJ#2 Ref. Sch. IMM 40	ADJ #3	Expense ADJ #4	Not Used ADJ #5	Expense ADJ #6	Tax Expense	RUCO
Measured Water Revenues	\$ 116,023	1	\$	\$	Ref. Sch JMM-12	-13	Ref: Sch JMM-14	Ref: Sch JMM-15	ADJUSTED
	5,261	(1,820)				• •	,		116,023
6 Total Operating Revenues7	\$ 121,284	\$ (1,820)	\$, ,		3,441
8 OPERATING EXPENSES:				•	•	€	\$		119,464
o Sciences and Wages 10 Purchased Water	,	\$ -	,	•	6				
11 Purchased Power	26,213		•	•		÷	.	\$	•
/z Sludge Kemoval 13 Chemicals	12,659	•	• •		•	,	, ,	•	
14 Materials and Supplies	5,400	•					,		26,213
_	7,187	•		•			,		5.400
16 Contractual Services - Accounting	20.135						,		7,187
1/ Contractual Services - Professional	1,920	. ,		•		•	, ,		2,446
19 Contractual Services - Other		•					•		20,135
20 Wastewater Testing	46,650	•	•	•		•	•		21.
ш,	600,0		8,858	•			•		46,650
22 Transportation Expenses	3,250		•		•				14,527
24 Insurance - General Liability	2,186	•		•	•		,		3.250
						•	r		2,186
26 Reg. Comm. Exp Rate Case	10.000	•	•						. '
28 Bod Dobt Fire and	13,152			(10,000)	•				
		•			(4,116)	•		•	. ;
30 Taxes Other Than Income	45,744	•	. ,			ī	,		9,036
ш.	- 7			•					45.744
	(13,545)			•			- 7		
	12121	• •		,		. ,	(480)		3,995
35 Operating Expenses 35 Operating Income (Lose)		\$	8.858	(10,000) \$	- 1	-		13,545	0
	\$ (72,257)	\$ (1,820) \$	(8,858)	10.000	(4,116) \$	\$	(480)	13,545 \$	201.346
				Ш	4,110		480 \$	(40 EAE) &	2121

OPERATING INCOME ADJUSTMENT NO. 1 - OTHER OPERATING REVENUE

			[A]		[B]		[C]
LINE		CON	IPANY	F	RUCO	R	UCO
NO.	DESCRIPTION	PRO	POSED	ADJU	STMENTS	RECO	MMENDED
1	Other Operating Revenues	\$	5,261	\$	(1,820)	\$	3,441

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 2 - WASTEWATER TESTING EXPENSE

			[A]		[B]		[C]
LINE		CO	MPANY		RUCO		RUCO
NO.	DESCRIPTION	PRC	POSED	ADJUSTMENTS		RECOMMENDED	
1	Wastewater Testing Expense	\$	5,669	\$	8,858	\$_	14,527

REFERENCES: Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 3 - RATE CASE EXPENSE

		[A]			[B]	[C]	
LINE		COMP	ANY	R	UCO	RUC	5
NO.	DESCRIPTION	PROPO	SED	ADJUS	STMENTS	RECOMME	NDED
1	Rate Case Expense	\$ 1	0,000	\$	(10,000)	\$	

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 4 - MISCELLANEOUS EXPENSE

			[A]		[B]	[C]	
LINE NO.	DESCRIPTION				RUCO ISTMENTS		RUCO MMENDED
1	Miscellaneous Expense	\$	13,152	\$	(4,116)	\$	9,036
	Automobile Expense	\$	1,750				
	Telephone Expense	<u>\$</u> \$	2,366 4,116				

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 5 - NOT USED

		[A]	[B]	[C]
LINE		COMPANY	RUCO	RUCO
NO.	DESCRIPTION	PROPOSED	ADJUSTMENTS	RECOMMENDED
1		\$ -	\$ -	\$ -

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

OPERATING INCOME ADJUSTMENT NO. 6 - PROPERTY TAX EXPENSE

			[A]		[B]
LINE			RUCO		RUCO
NO.	Property Tax Calculation	AS	ADJUSTED	REC	OMMENDED
1	RUCO Adjusted Test Year Revenues	\$	119,464	\$	119,464
2	Weight Factor		2		2_
3	Subtotal (Line 1 * Line 2)		238,928	\$	238,928
4	RUCO Recommended Revenue, Per Schedule JMM-1		119,464	\$	279,524
5	Subtotal (Line 4 + Line 5)		358,391		518,451
6	Number of Years		3		3
7	Three Year Average (Line 5 / Line 6)		119,464	\$	172,817
8	Department of Revenue Mutilplier		2		2
9	Revenue Base Value (Line 7 * Line 8)		238,928	\$	345,634
10	Plus: 10% of CWIP -		-		-
11	Less: Net Book Value of Licensed Vehicles		-	\$	_
12	Full Cash Value (Line 9 + Line 10 - Line 11)		238,928	\$	345,634
13	Assessment Ratio		18.125%		18.125%
14	Assessment Value (Line 12 * Line 13)		43,306	\$	62.646
15	Composite Property Tax Rate (Per Company Schedule)		9.2262%	•	9.2262%
16					
17	RUCO Test Year Adjusted Property Tax (Line 14 * Line 15)	\$	3,995		
18	Company Proposed Property Tax	•	4,476		
19			.,,		
20	RUCO Test Year Adjustment (Line 16-Line 17)	\$	(480)		
21					
22	Property Tax - RUCO Recommended Revenue (Line 14 * Line 15)			\$	5,780
23	RUCO Test Year Adjusted Property Tax Expense (Line 16)			\$	3,995
24	Increase in Property Tax Expense Due to Increase in Revenue Requirement			¢ .	1,784
25	The same with report y tax axposted bas to merodood in recording respondent		:	Ψ	1,704
26	Increase to Property Tax Expense			\$	1,784
27	Increase in Revenue Requirement			Φ	,
28	·				160,060
29	Increase to Property Tax per Dollar Increase in Revenue (Line19/Line 20)				1.114829%
30	Property Tax Conversion Factor = 1 / (101114829)				4.044074
30	1 topetty Tax Conversion Factor = 17 (101114029)				1.011274

REFERENCES:

OPERATING INCOME ADJUSTMENT NO. 7 - INCOME TAX EXPENSE

		[A]	[B]	[C]	
LINE		COMPANY	RUCO	RUCO	
NO.	DESCRIPTION	PROPOSED	ADJUSTMENTS	RECOMMENDED	
1	Income Taxes	\$ (13,545)	\$ 13,545	\$ 0	

REFERENCES:

Column [A]: Company Filing Column [B]: Testimony JMM

Rate Design

Monthly Usage Charge	Present	Company Proposed Rates	RUCO Recommended Rates		
Meter Size (All Classes): 5/8x3/4 Inch 3/4 Inch 1 Inch 1 1/2 Inch 2 Inch 3 Inch 4 Inch	\$ - - - - - -	\$ 53.00 53.00 132.50 265.00 424.00 848.00 1,325.00 2,650.00	\$ - - - - - - -		
8 Inch 10 Inch 12 Inch Commodity Charge - Per 1,000 Gallons of Water Usage	N/A	N/A	·		
	N/A	N/A	-		
	N/A	N/A	-		
Residential Commercial and Industrial Car washes, laudromats, Commercial, Manufacturing Hotels, Motels Restaurants Industrial Laundries Waste Haulers Restaurant Grease Treatment Plant Sludge Mud Sump Waste	\$ 5.8400	\$ 5.3144	\$ 13.8992		
	5.7100	5.1961	13.5898		
	7.6600	6.9706	18.2308		
	9.4600	8.6086	22.5148		
	8.3900	7.6349	19.9682		
	171.2000	155.7920	407.4560		
	149.8000	136.3180	356.5240		
	171.2000	155.7920	407.4560		
	535.0000	486.8500	1,273.3000		

>

Typical Bill Analysis General Service 3/4-Inch Meter

Company Proposed	Gallons	Present Rates	roposed Rates	 Dollar Increase	Percent Increase
Average Usage	4,123	\$ 24.08	\$ 74.91	\$ 50.83	211.13%
Median Usage	3,500	20.44	71.60	\$ 51.16	250.30%
RUCO Recommended		 	 	 	
Average Usage	4,123	\$ 24.08	\$ 57.30	\$ 33.23	138.00%
Median Usage	3,500	20.44	48.65	\$ 28.21	138.00%

Present & Proposed Rates (Without Taxes) General Service 3/4-Inch Meter

				Company			RUCO	
Gallons Present		Proposed		%	Ð	ecommended	%	
Consumption		Rates		Rates	Increase	- '	Rates	Increase
-	\$		\$	53.00	#DIV/0!	\$	TRACO	#DIV/0!
1.000	Š	5.84	\$	58.31	898.53%	\$	13.90	138.00%
2,000	\$	11.68	\$	63.63	444.77%	\$	27.80	138.00%
3,000	\$	17.52	\$	68.94	293.51%	\$	41.70	138.00%
4.000	\$	23.36	\$	74.26	217.88%		55.60	138.00%
5,000	\$	29.20	\$	79.57	172.51%	\$	69.50	138.00%
6,000	\$	35.04	Ś	84.89	142.26%	\$	83.40	138.00%
7,000	\$	40.88	\$	90.20	120.65%	\$	97.29	138.00%
8,000	\$	46.72	\$	95.52	104.44%	Š	111.19	138.00%
9,000	\$	52.56	\$	100.83	91.84%	\$	125.09	138.00%
10,000	\$	58.40	\$	106.14	81.75%	Š	138.99	138.00%
11,000	\$	64.24	\$	111.46	73.50%	\$	152.89	138.00%
12,000	\$	70.08	\$	116.77	66.63%	\$	166.79	138.00%
13,000	\$	75.92	\$	122.09	60.81%	\$	180.69	138.00%
14,000	\$	81.76	\$	127,40	55.82%	\$	194.59	138.00%
15,000	\$	87.60	\$	132.72	51.50%	\$	208.49	138.00%
16,000	\$	93.44	\$	138.03	47.72%	\$	222.39	138.00%
17,000	\$	99.28	\$	143.34	44.38%	\$	236.29	138.00%
18,000	\$	105.12	\$	148.66	41.42%	\$	250.19	138.00%
19,000	\$	110.96	\$	153.97	38.76%	\$	264.08	138.00%
20,000	\$	116.80	\$	159.29	36.38%	\$	277.98	138.00%
25,000	\$	146.00	\$	185.86	27.30%	\$	347.48	138.00%
30,000	\$	175.20	\$	212.43	21.25%	\$	416.98	138.00%
35,000	\$	204.40	\$	239.00	16.93%	\$	486.47	138.00%
40,000	\$	233.60	\$	265.58	13.69%	\$	555.97	138.00%
45,000	\$	262.80	\$	292.15	11.17%	\$	625.46	138.00%
50,000	\$	292.00	\$	318.72	9.15%	\$	694.96	138.00%
75,000	\$	438.00	\$	451.58	3.10%	\$	1,042.44	138.00%
100,000	\$	584.00	\$	584.44	0.08%	\$	1,389.92	138.00%